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## Chelmsford Policy Board

26 September 2024

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## Chelmsford Local Plan – Preferred Options Consultation Feedback

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### Report by:

Director of Sustainable Communities

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### Purpose

The purpose of this report is to provide feedback on the main issues raised in the consultation responses to the Local Plan Preferred Options Document and Preferred Options Integrated Impact Assessment. The report also provides information on the work being undertaken to prepare the Pre-Submission Local Plan.

### Recommendations

1. That the Board notes the outcomes of the consultation contained within the covering report and attached at Appendices 1 and 2.
2. That the Board note the work being undertaken to prepare a Pre-Submission Local Plan.
3. To give delegated authority to the Director of Sustainable Communities in consultation with the Cabinet Member for a Greener Chelmsford to make any necessary minor amendments to the Chelmsford Local Plan Preferred Options Feedback Report and Preferred Options Integrated Impact Assessment Feedback Report before publication as part of the Local Plan evidence base.

## 1. Introduction

- 1.1. The Preferred Options consultation represents the second formal stage in the preparation of the review of the adopted Local Plan. This stage of the process sought to gather views on a new full draft plan including the plan vision, priorities, site allocations and planning policies to meet development requirements up to 2041, and the draft policies map.
- 1.2. This report provides a summary of the consultation and the main issues raised in the responses with full details contained within the consultation Feedback Reports given at Appendices 1 and 2. It also provides details on the work being undertaken to prepare a Pre-Submission Local Plan including an update to the evidence base.

## 2. About the Preferred Options and Integrated Impact Assessment Consultation

- 2.1 A comprehensive six-week programme of consultation took place during the consultation period which ran from 8 May to 19 June 2024 on the Local Plan Preferred Options and its accompanying Integrated Impact Assessment (IIA). This followed (and exceeded) the requirements set out in legislation<sup>1</sup>, and the commitments in the Council's Adopted Statement of Community Involvement (September 2020)<sup>2</sup>.
- 2.2 The consultation was promoted through a range of activities including email/letter notifications to more than 2,800 contacts registered on the Council's Consultation Portal, on the Council's website, press releases, adverts in local publications and social media. Consultation activities included placing consultation documents on deposit at the Council's Customer Service Centre, organising stakeholder presentations, Duty to Co-operate meetings, a virtual exhibition and staffed face to face exhibitions. An animated Local Plan video was also available. More information on the consultation undertaken is provided in Section 1 of the Preferred Options Feedback Report at Appendix 1.

## 3. Summary of the responses to the Preferred Options Local Plan

- 3.1. A total of 10,418 responses were received to the Preferred Options Local Plan from 3,678 respondents. The respondents are from a wide variety of groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other local authorities and Parish/Town Councils. All respondents have received an acknowledgement for their comments and have been notified of this Board meeting. All the comments received can be viewed on the Council's [planning policy consultation portal](#).

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<sup>1</sup> Town and Country Planning (Local Planning) (England) Regulations 2012  
<https://www.legislation.gov.uk/ukxi/2012/767/contents>

<sup>2</sup> Statement of Community Involvement <https://www.chelmsford.gov.uk/media/byjfrq2v/statement-of-community-involvement-adopted-september-2020.pdf>

- 3.2. The consultation asked for views on the preferred options contained within the consultation document. Section 3 of the Preferred Options Feedback Report in Appendix 1 provides a summary of the key main issues raised in the responses in consultation document order. It is stressed that it does not seek to report on every point raised nor does it analyse or provide a Council response to the comments received but it does summarise the main themes within the consultation responses. However, we will be assessing all the information received and respond to the consultation comments at the next stage in the plan preparation process, or alongside the Pre-Submission Local Plan.
- 3.3. Section 3 of the Feedback Report outlines how the consultation is set out. Comments from public sector bodies, infrastructure or service providers and developers/ landowners are specified in brackets at the end of relevant bullet points. This is because it is useful to understand the nature of respondents, particularly where a stakeholder has a legal duty or responsibility over a matter that they are making comments about. We have not specified who has made comments from members of the public as to do so would result in a very long report, so bullet points from the public do not have brackets. It should be noted that in some cases, members of the public raised similar points to stakeholders. This is especially the case in relation to comments made by Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group to Strategic Growth Sites 16a (Hammonds Farm) and 16b (Junction 18 of the A12) which have been replicated and amplified by many individuals. To avoid duplication, these comments have not been repeated in the public comments.
- 3.4. An overview of the key issues raised in response to the draft plan is provided below.

Overall:

- A wide range of feedback was received ranging from general comments to technical observations on detailed policy wording
- New policies, policies proposed for more substantive changes, and some new land allocations for development attracted the greatest level of comments
- Some policies of the plan did not attract any comments
- Most Government or national bodies either support the plan outright or offer qualified support subject to some proposed amendments
- Mix of support and opposition from Town/Parish Councils, with many suggesting changes from minor amendments to the deletion of site allocations
- Most public comments were objecting to one or more aspects of the plan, though there was limited support
- Hammonds Farm and Junction 18 of the A12 (SGS16a-b) received a very large number of public objections, with many comments being sent by 'Say No to Hammonds Farm' - a coalition Boreham, Sandon, Danbury and Little Baddow Parish Councils
- Many developers/landowners support development proposed on their sites, with some seeking changes to the allocations policies and boundaries
- Many developers/landowners object where the plan did not allocate specific land or sites for development and call for Green Belt and Green Wedge reviews.

Strategic Priorities:

- Support for the preferred Strategic Priorities including new Strategic Priorities 1 and 2
- Some detailed wording amendments proposed including strengthening the emphasis on addressing climate change and on meeting housing needs in full
- References to some other strategies and plans are proposed including the Essex Local Nature Recovery Strategy and the Council's Plan for Improving Rivers and Waterways
- Some call for a review of the Green Belt to identify sites which may be more suitable for development and to provide a more balanced/sustainable Spatial Strategy.

Vision:

- Overall support for the Vision
- Requests for more explanation on how the Vision bullet points relate to the Vision and will be used in future decision making
- Some detailed wording amendments proposed to the Vision bullet points including adding references to multifunctional green/blue infrastructure and Biodiversity Net Gain
- Additional bullet points proposed including around supporting rural areas and rural tranquillity
- Some comments suggesting that Hammonds Farm is contrary to the Vision.

Spatial Principles:

- Good level of general support
- Some developers consider there should be a Green Belt review to identify sustainable development opportunities in this area
- Some developers call for more development to be focused on lower order settlements
- Some detailed wording amendments, and an additional principle proposed around integrating strategic green infrastructure with ecological networks and the wider landscape.

Strategic Policies for creating sustainable development:

- Overall support for the Strategic Policies including new policies S14 (Health and Wellbeing) and S16 (Connectivity and Travel)
- Many objections from the development industry to policy requirements which exceed national planning policy including net zero homes (Policy S2) and 20% biodiversity net gain (Policy S4)
- Concerns over the evidence base for some new policy requirements, including net zero homes (Policy S2) and Health Impact Assessments (Policy S14)
- Some detailed wording changes proposed to expand, amend, clarify and update policies
- Some additional policy requirements proposed including to assist with the delivery of biodiversity net gain and ecosystems restoration (Policy S2)

- References to some other strategies and guidance are proposed including the Chelmsford Health and Wellbeing Plan (Policy S14)
- Support for promoting sustainable travel methods but concerns are raised about how feasible and deliverable these will be in some areas
- Support for the investment and improvements to key infrastructure, although some concerns about the funding and timing of infrastructure.

Strategic Policies for how future development growth will be accommodated:

- Mix of support and opposition to Development Requirements (Policy S6) and the Spatial Strategy (Policy S7)
- Requests from Castle Point and Southend Borough Councils as to whether Chelmsford City Council can accommodate any of their unmet housing need
- Adjustments requested to the Settlement Hierarchy
- Some developers are calling for higher housing and employment requirements
- Some developers request a specific requirement around meeting the housing needs of older people
- Objections to some site allocations in particular, Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) and calls for their removal/replacement. There is also limited support for these development proposals
- Concerns that the Spatial Strategy is too reliant on larger strategic sites and that a sufficient range of reasonable alternatives approaches, and site options have not considered or appraised
- Concerns over lack of evidence for and delivery of the Gypsy and Travellers and Travelling Showpeople requirements
- Broad support from the promoters of allocated sites with some requesting higher quantum and larger site areas
- Many developers propose alternative development land and sites including within the Green Belt and Green Wedge
- Calls for the expansion of the North-East Chelmsford Garden Community site and clarity sought over why this option is rejected
- Broad support for other Strategic Policies including Delivering Economic Growth (Policy 8) and Connectivity and Travel (Policy S16)
- Concerns over existing infrastructure capacity constraints and the delivery of new infrastructure including transport, education and healthcare
- Some detailed wording changes proposed to expand, amend, clarify and update policies
- Some additional policy requirements proposed including supporting regional growth sector priorities (Policy S8)
- References to some other strategies, guidance and projects proposed including Thames Freeport (in Policy S9).

Site allocation policies for new development growth:

- Support expressed for many proposed site allocation policies
- Support for site allocations and development on brownfield land, but public opposition to removal of car parks to allow for development in Chelmsford Urban Area

- Significant levels of opposition to Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) for multiple reasons including traffic, landscape, flood risk and heritage impacts, with calls for their removal. There is also some limited support for these development proposals
- High level of objections to some other site allocations in particular Waltham Road Employment Area (GS9a), Land at Kingsgate, Bicknacre (GS11b) and Land West of Barbrook Way, Bicknacre (GS11c) for multiple reasons including traffic, landscape and flood risk impacts and calls for their removal
- Some detailed wording changes proposed to expand, amend, clarify and update site policies including in relation to active travel, green infrastructure, waste water, heritage and flood risk
- Broad support from the promoters of allocated sites with some requesting higher quantum and larger site areas
- Many developers propose alternative development land and sites including within the Green Belt and Green Wedge
- Concerns over existing infrastructure capacity constraints and the delivery of new infrastructure including transport, education and healthcare
- Calls for changes to masterplan requirements for strategic sites and Special Policy Areas
- Requests for policy and boundary changes to some Special Policy Areas including ARU Writtle.

#### Development Management Policies:

- Broad support for many policies including biodiversity net gain (in Policy DM16) and net zero homes (in Policy DM31)
- Opposition from the development industry to some new policies and/or requirements including housing policies DM1 and DM2, sustainable buildings DM25 and DM16 and DM31
- Requests for clarifications, more detail, greater justification for and wording changes to many policies
- Essex County Council and Anglian Water Services recommend a more ambitious water efficiency standard in sustainable buildings (DM25)
- Some developers are seeking a more flexible approach to development within the Green Belt and Green Wedge
- Concerns over the evidence base to justify some new policy requirements, and how they will affect development viability and delivery including net zero homes (Policy DM31)
- Three new plan policies suggested – one from Natural England to address the cumulative increased recreational pressure on SSSIs and two from Essex County Council to mitigate overheating risk in new development, and to address embodied carbon emissions from new development.

#### Monitoring Framework:

- Some suggested additional monitoring indicators relating to Health Impact Assessments.

#### Policies Map:

- Suggested changes to some notations and designations including settlement boundaries, the Green Wedge and the Hammonds Farm site (SGS16a).

Consultation:

- Some criticism regarding the length of the consultation period and the process for making comments using the online portal.

#### 4. Summary of responses to the IIA

- 4.1. An Integrated Impact Assessment (IIA) is being developed alongside the Local Plan review document. The IIA covers the traditional supporting Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment, with the addition of a Health Impact Assessment and Equalities Impact Assessment.
- 4.2. A total of 65 responses were received to the Preferred Options Integrated Impact Assessment (IIA) consultation from 48 respondents. These have been analysed separately to the Preferred Options Local Plan representations by independent consultants, and the outcomes will feed directly into the next stage of the IIA which will be prepared to accompany the Pre-Submission Local Plan. The IIA Feedback Report is attached at Appendix 2.
- 4.3. There was general support for the IIA and its analysis across the responses, with specific comments summarised below:
  - Questioning the scoring by the IIA for specific indicators and how mitigation measures will be applied
  - Objections to specific proposed strategic site allocations in respect of key sustainability criteria and use of the evidence
  - The presence of alternative spatial options which are deemed more sustainable, consequently invalidating the choice of preferred allocations
  - Lack of a comprehensive Green Belt Review undermines the IIA because a full range of alternative strategic options have not been presented
  - A sufficient range of reasonable alternatives and/or specific alternative sites and site options not considered or appraised
  - Some uncertainties recorded by the IIA undermine of the overall analysis and conclusions on site sustainability
  - Lack of consideration of the availability, capacity and standards of community infrastructure.
- 4.4. The Feedback Report includes a summary of the consultee responses, and a response/action describing how the comments will be considered. This includes updating text or, where no change is proposed, explaining how the next iteration of the IIA will address the points raised.

## 5. Preparation of the Pre-Submission Local Plan

- 5.1. Responses to the Preferred Options Local Plan and the IIA consultation documents will be considered in detail by Officers and the Council's consultants and used alongside the plan evidence base and Government policy to help inform the next stage of the review – the Pre-Submission Local Plan.
- 5.2. In July 2024, the Government published its proposals for revising the National Planning Policy Framework (NPPF) with a closing date for comments of 24 September 2024. The consultation proposes changes in relation to housing numbers and the future of Local Plans to be considered when producing the Pre-Submission plan. A report summarising the key changes proposed in the consultation and a Council response was considered by Cabinet on 10 September 2024 - see link below to agenda papers.

[www.chelmsford.gov.uk/committee-meetings/cabinet-september-2024/](http://www.chelmsford.gov.uk/committee-meetings/cabinet-september-2024/)

- 5.3. The Government's consultation on changes to the NPPF sets out proposals for transitional arrangements for the progression of Local Plans that are at an advanced stage of preparation, such as Chelmsford. As this is a consultation, the final transitional arrangements have not yet been defined. Considering the advanced stage of Chelmsford's Local Plan preparation and the prudent approach to include a housing supply buffer in the Preferred Options Local Plan, it is the Council's view that preparation of the Local Plan should continue as planned with a view to make use of the transitional arrangements when finalised. As set out in the Council's approved plan making timetable, the Pre-Submission consultation (Regulation 19) is scheduled to take place in early 2025.
- 5.4. As part of this process, the Council is producing some other new evidence and updating some existing studies to inform the Pre-Submission Local Plan. This includes further detailed Traffic Modelling, a partial Local Wildlife Sites Review, updated Archaeology Assessment, and new Open Space and Air Quality Assessments. These, and other new and updated documents, will be added to the evidence base and published when they are completed.
- 5.5. Discussions are continuing with infrastructure providers in relation to their services, and what new or expanded provision will be required to support planned growth. This work will also feed into an updated Infrastructure Delivery Plan and Local Plan Viability Assessment.
- 5.6. The Council is also continuing to be active in consulting and collaborating with neighbouring local planning authorities and other duty bodies in developing the Local Plan and its associated evidence base. This includes direct discussions with adjacent Councils in respect of potential cross boundary matters such as unmet housing needs.
- 5.7. When the new NPPF will be published, and its final content are currently unknown so there is a risk that the Pre-Submission plan may not be published in time to meet the proposed transitional arrangements. However, the plan is progressing along a similar timeline to the revised NPPF, so workstreams will



continue with the goal of trying to take advantage of the proposed transitional arrangements.

## 6. Conclusion

- 6.1. The Preferred Options consultation was the second stage in producing the review of the adopted Chelmsford Local Plan. It was supported by a strong consultation strategy and attracted a high level of response from a wide variety of individuals and organisations. It is important to progress the review of the Local Plan, to ensure that Chelmsford continues to have an up-to-date plan. The consultation responses will be carefully considered and used to inform the Pre-Submission Local Plan, alongside further evidence base studies and national planning policy.
- 6.2. Consultation on the Pre-Submission Local Plan is programmed to take place in early 2025 in accordance with the current timetable and to try to comply with the proposed transitional arrangements.

### List of Appendices:

**Appendix 1** – Chelmsford Local Plan Preferred Options Feedback Report

**Appendix 2** – Preferred Options Integrated Impact Assessment Feedback Report

### Background Papers:

[Local Plan Preferred Options Consultation Document](#)

[Local Plan Preferred Options Integrated Impact Assessment \(IIA\)](#)

[Chelmsford Policy Board on 14 July 2022](#), agenda Item 6 Review of Adopted Local Plan – Issues and Options Consultation

[Chelmsford Policy Board on 28 February 2023](#), agenda Item 5 Review of Adopted Local Plan – Issues and Options Consultation Feedback

[Cabinet on 10 September 2024](#), agenda Item 6.1 National Planning Policy Framework Consultation Response

[Proposed reforms to the National Planning Policy Framework and other changes to the planning system, 30 July 2024](#)

[National Planning Policy Framework: draft text for consultation, 30 July 2024](#)

Outcome of the proposed revise method – available at [Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK \(www.gov.uk\)](#)

[Chelmsford City Council Adopted Local Plan](#)

[National Planning Policy Framework, December 2023](#)

[Ministerial Statement - Planning - Local Energy Efficiency Standards Update 13 December 2023](#)

[Planning practice guidance](#)

[Statement of Community Involvement, September 2020](#)

Local Development Scheme, November 2023 - available here [Local Plan Review 2022 \(chelmsford.gov.uk\)](#)

Chelmsford Local Plan Preferred Options Tracked Changes Version, March 2024 – available via evidence base tab here [Local Plan Review 2022 \(chelmsford.gov.uk\)](#)

Preferred Options evidence base reports – available via evidence base tab here [Local Plan Review 2022 \(chelmsford.gov.uk\)](#)

Preferred Options Local Plan Form and Content Checklist, March 2024 – available via evidence base tab here [Local Plan Review 2022 \(chelmsford.gov.uk\)](https://www.chelmsford.gov.uk/Local-Plan-Review-2022) [Authority Monitoring Report, December 2023](#) Authority Monitoring Report, December 2023

### Corporate Implications:

#### **Legal/Constitutional:**

There is a need to ensure the Review of the Local Plan accords with the latest legislative requirements.

#### **Financial:**

There are no cost implications arising directly from this report. The Local Plan is being prepared using the existing agreed budget.

#### **Potential Impact on Climate Change and the Environment:**

The review of the adopted Local Plan will seek to ensure new development within the administration area will contribute towards meeting the Council's Climate Change agenda.

#### **Contribution toward Achieving a Net Zero Carbon Position by 2030:**

The review of the adopted Local Plan will seek to ensure new development within the administration area will contribute towards achieving a net zero carbon position by 2030.

#### **Personnel:**

There are no personnel issues arising directly from this report.

#### **Risk Management:**

There are several risk considerations associated with local plan production. These are set out in the report and in the Local Development Scheme 2023 with contingency measures.

#### **Equality and Diversity:**

The Public Sector Equality Duty applies to the council when it makes decisions. An Equalities and Diversity Impact Assessment forms part of the Integrated Impact Assessment for the review of the Local Plan and concludes that it will not have a disproportionate adverse impact on any people with a particular characteristic and in general will have positive or neutral impacts across a wide range of people and will be compatible with the duties of the Equality Act 2010.

#### **Health and Safety:**

There are no Health & Safety issues arising directly from this report.

#### **Digital:**

There are no digital issues arising directly from this report.

#### **Other:**

The Review of the Local Plan will seek to contribute to priorities in the Council's Our Chelmsford, Our Plan 2020: A Fairer and Inclusive Chelmsford, A Safer and Greener Place, Healthy, Enjoyable and Active Lives and A Better Connected Chelmsford.

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Consultees:

CCC – Legal Services  
CCC – Communications

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Relevant Policies and Strategies:

The report takes account of the following policies and strategies of the City Council:

Adopted Local Plan 2013-2036 and supporting Supplementary Planning Documents and Planning Advice Notes  
Our Chelmsford, Our Plan (2024)  
Statement of Community Involvement (2020)  
Health and Wellbeing Plan (2019)  
Public Open Spaces Policy (2022)  
Climate and Ecological Emergency Action Plan (2020)  
Housing Strategy 2022-27 (2022)  
Homelessness and Rough Sleeping Strategy 2020-24 (2020)  
Cultural Strategy (2023)  
Plan for Improving Rivers and Waterways (2022)  
Chelmsford Green Infrastructure Strategic Plan 2018-2036  
Essex Coast Recreational disturbance Avoidance and Mitigation Strategy 2018-2038  
Climate and Ecological Emergency Action Plan (2020)  
Duty to Co-operate Strategy (2022)

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Our Chelmsford, Our Plan

The above report relates to the following priorities in the Corporate Plan:

Promoting sustainable and environmentally responsible growth to stimulate a vibrant, balanced economy, a fairer society and provide more homes of all types.

Creating a distinctive sense of place, making the area more attractive, promoting its green credentials, ensuring that people and communities are safe.

Bringing people together and working in partnership to encourage healthy, active lives, building stronger, more resilient communities so that people feel proud to live, work and study in the area.



# Chelmsford Local Plan Preferred Options Consultation Document Feedback Report

September 2024

For Chelmsford Policy Board  
26 September 2024

**NOT FINAL VERSION**

*Our Planning Strategy 2022 to 2041*

**Chelmsford**  
Local Plan 

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## Abbreviations

BNG	Biodiversity Net Gain
CCC	Chelmsford City Council
CIL	Community Infrastructure Levy
CNG	Compressed Natural Gas
CLT	Community Land Trust
DSB	Defined Settlement Boundary
ECC	Essex County Council
EDG	Essex Design Guide
EPOA	Essex Planning Officers Association
ESP	Employment and Skills Plan
EqIA	Equality Impact Assessment
EV	Electric Vehicle
GI	Green Infrastructure
GTAA	Gypsy and Traveller Accommodation Assessment
HAR	Heritage At Risk
HIA	Health Impact Assessment
HMO	House in Multiple Occupation
IDP	Infrastructure Delivery Plan
IIA	Integrated Impact Assessment
IWM	Integrated Water Management
LCWIP	Local Walking and Cycling Infrastructure Plan
LNR	Local Nature Reserve
LNRS	Local Nature Recovery Strategy
LPA	Local Planning Authority
LTP	Local Transport Plan
MMO	Marine Management Organisation
NCN	National Cycle Network
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SANG	Suitable Alternative Natural Greenspace
SFRA	Strategic Flood Risk Assessment
SGS	Strategic Growth Site
SME	Small and Medium Sizes Enterprises
SHELAA	Strategy Housing and Employment Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SHNA	Strategic Housing Needs Assessment
SPA	Special Policy Area
SRA	Specialist Residential Accommodation
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
TCPA	Town and Country Planning Association
UAB	Urban Area Boundary

## **Executive Summary**

This report sets out a summary of the consultation and the main issues raised in the responses received on the Preferred Options Local Plan. The consultation document set out the preferred spatial strategy for new homes and jobs for the future growth and development of the city up to 2041. It also contained updated and new policies which would be used to determine planning applications.

## **About the Consultation**

A comprehensive six-week programme of consultation took place during the formal consultation period from 10am on Wednesday 8th May 2024 to 4pm on Wednesday 19th June 2024. The consultation was promoted through a range of activities including email/letter notifications to more than 2,800 contacts registered on the Council's Consultation Portal, on the Council's website, press releases, adverts in local publications and social media. Consultation activities included placing consultation documents on deposit at the Council's Customer Service Centre, organising stakeholder presentations, Duty to Co-operate meetings, a virtual exhibition and staffed physical exhibitions.

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- Significant levels of opposition to Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) for multiple reasons including traffic, landscape, flood risk and heritage impacts, with calls for their removal. There is also some limited support for these development proposals
- High level of objections to some other site allocations in particular Waltham Road Employment Area (GS9a), Land at Kingsgate, Bicknacre (GS11b) and Land West of Barbrook Way, Bicknacre (GS11c) for multiple reasons including traffic, landscape and flood risk impacts and calls for their removal
- Some detailed wording changes proposed to expand, amend, clarify and update site policies including in relation to active travel, green infrastructure, waste water, heritage and flood risk
- Broad support from the promoters of allocated sites with some requesting higher quantum and larger site areas
- Many developers propose alternative development land and sites including within the Green Belt and Green Wedge
- Concerns over existing infrastructure capacity constraints and the delivery of new infrastructure including transport, education and healthcare
- Calls for changes to masterplan requirements for strategic sites and Special Policy Areas
- Requests for policy and boundary changes to some Special Policy Areas including ARU Writtle.

#### Development Management Policies:

- Broad support for many policies including biodiversity net gain (in Policy DM16) and net zero homes (in Policy DM31)
- Opposition from the development industry to some new policies and/or requirements including housing policies DM1 and DM2, sustainable buildings DM25 and DM16 and DM31
- Requests for clarifications, more detail, greater justification for and wording changes to many policies
- Essex County Council and Anglian Water Services recommend a more ambitious water efficiency standard in sustainable buildings (DM25)
- Some developers are seeking a more flexible approach to development within the Green Belt and Green Wedge
- Concerns over the evidence base to justify some new policy requirements, and how they will affect development viability and delivery including net zero homes (Policy DM31)
- Three new plan policies suggested – one from Natural England to address the cumulative increased recreational pressure on SSSIs and two from Essex County Council to mitigate overheating risk in new development, and to address embodied carbon emissions from new development.

#### Monitoring Framework:

- Some suggested additional monitoring indicators relating to Health Impact Assessments.

#### Policies Map:

- Suggested changes to some notations and designations including settlement boundaries, the Green Wedge and the Hammonds Farm site (SGS16a).

#### Consultation:

- Some criticism regarding the length of the consultation period and the process for making comments using the online portal.

#### **Next Steps**

All responses are being considered in detail and will be used to help inform the next stage of the review Local Plan (Pre-Submission - Regulation 19). Once we have reviewed all the comments, we will publish a document to show how those comments have been taken into consideration when preparing the Pre-Submission. This is alongside ongoing discussions with infrastructure providers about their services, such as education, and completion of evidence studies covering topics including traffic modelling, air quality, open space, and viability. The Pre-Submission plan will also need to reflect national planning policy and guidance.

## **Introduction**

The Preferred Options consultation represented the second formal stage in the preparation of the Review of the Adopted Chelmsford Local Plan. The consultation document set out the preferred spatial strategy for new homes and jobs for the future growth and development of the city up to 2041. It also contained updated and new policies which would be used to determine planning applications. The consultation was undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

This consultation was preceded by an Issues and Options consultation undertaken in 2022 also undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

## **Purpose of this Feedback Report**

This report sets out the consultation feedback received on the Preferred Options document from a wide variety groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other local authorities and Parish/Town Councils.

This report is constructed in three parts. Section 1 provides a summary of the public and stakeholder consultation undertaken.

Section 2 gives a summary of the representations received.

Section 3 provides a breakdown of the main issues raised in the consultation responses starting with comments expressing support. The report is set out in document order and therefore the policy numbers may not be in sequence. This section does not summarise every representation or identify every individual detailed issue, as the purpose is to identify key issues and suggested changes. It also does not seek to analyse or provide a Chelmsford City Council (CCC) response to the comments. We will be assessing all the information received and respond to the consultation comments as the review of the adopted Chelmsford Local Plan develops.

## Section 1: Summary of Consultation Undertaken

A comprehensive six-week programme of consultation took place during the formal consultation period from 10am on Wednesday 8<sup>th</sup> May 2024 to 4pm on Wednesday 19<sup>th</sup> June 2024.

This programme of consultation followed (and exceeded) the requirements set out in legislation, and the commitments in the Council's adopted Statement of Community Involvement (September 2020).

The package of documents published on 8 May comprised:

- Preferred Options Local Plan Consultation Document; and
- Preferred Options Integrated Impact Assessment (subject of a separate Feedback Report); and
- Consultation Statement outlining full details about the consultation process.

This package of documents was placed on deposit at CCC Customer Service Centre, with electronic versions available to view at most Parish/Town Council offices and local libraries across Chelmsford.

The Council notified more than 2,800 contacts registered on its Consultation Portal. These included public, statutory agencies such as Essex County Council and Town/Parish Councils, utility companies, businesses, interest groups, and voluntary and community bodies. Council Members and staff were also notified.

A number of consultation events were arranged:

- Six staffed exhibitions, visited by 111 attendees
- 14 days of unstaffed exhibitions
- Four pop-up displays for the whole consultation period
- A bespoke Local Plan video, attracting 885 views
- An online virtual exhibition, visited by more than 455 views
- Officers also held targeted engagement including a Parish/Town Council Forum, Agent/Developers Forum and Local Authority Duty to Co-operate meeting.

Printed/online materials and advertisements were produced as follows:

- Web page with links to key materials including a Preferred Options Local Plan Tracked Changes May 2024 and the exhibition panels
- Advertisements in a local newspaper (Essex Chronicle)
- Six articles in City Life (CCC's online news website) and two in South Woodham Focus (independent community magazine)
- 24 social media posts
- Posters distributed to Parish/Town Councils, CCC offices and leisure facilities, post offices, doctors' surgeries, churches and local shops
- Summary newsletters widely available, in addition to being handed out at South Woodham Ferring railway station
- 89 site notices placed around new potential site allocations
- Three GovDelivery mailshots to 12,000 recipients.

A list of organisations consulted, and copies of key consultation materials are given in Appendix 1.

### **Integrated Impact Assessment of the review of the Adopted Local Plan: Preferred Options Consultation**

The Local Plan Integrated Impact Assessment (IIA) was also subject to consultation at the same time. The IIA brings various strands of assessment together, consisting of the Sustainability Appraisal, Strategic Environmental Assessment, Habitats Regulations Assessment, Health Impact Assessment, and Equalities Impact Assessment. Feedback on this document is summarised in a separate report prepared by the Council's IIA Consultants.

### **Call for Sites and SHELAA**

In addition to the Local Plan and IIA consultations, the Council undertook a Call for Sites to identify available land for consideration for future development. Nine new submissions and nine amendments to existing sites were submitted through this process. Once all sites have been assessed and updated, an updated Strategy Housing and Employment Land Availability Assessment (SHELAA) will be published.

### **Next Steps**

All responses are being considered in detail and will be used to help inform the next stage of the review Local Plan (Pre-Submission - Regulation 19). Once we have reviewed all the comments, we will publish a document to show how those comments have been taken into consideration when preparing the Pre-Submission. This is alongside ongoing discussions with infrastructure providers about their services, such as education, and completion of evidence studies covering topics including traffic modelling, air quality, open space, and viability. The Pre-Submission will also need to reflect national planning policy and guidance.

## **Section 2: Summary of Representations**

For this report, people and organisations who made a comment to the consultation are called 'respondents'.

### **Methodology**

Respondents had a choice of ways to make their comments, by:

- Answering questions included in a complete version of the consultation document published on the consultation portal
- Answering questions using a stand-alone online questionnaire published on the consultation portal
- Sending written comments in an e-mail
- Sending written comments by post.

The questionnaire mostly consisted of a main question with related questions seeking views and any information the Council may have missed, plus two monitoring questions.

Whichever method respondents used, all comments have been entered into the Council's consultation portal. Where respondents did not state which paragraph/section/policy or site they were commenting on, officers have assigned responses to the most relevant part of the Local Plan, with miscellaneous responses being recorded against the Foreword.

Where a Yes/No preference was invited to a question (for example, 'Do you agree with this section/policy/paragraph/table/figure?' and 'Are you a resident within the Chelmsford City Council area?'), these have been recorded only where the respondent stated their preference.

The questions for both online methods of response were identical, and have been combined for this report.

A small number of representations were received after the consultation closed, by prior agreement with officers, these have been analysed and included in the figures in this report. In addition, a small number of representations were 'inadmissible' due to their content. In these cases, as far as possible, the main point of the representation has been recorded minus the offending remarks.

To ensure proper consideration of issues, respondents have been divided into types depending on their interface with the Council. Some fall into more than one category, so totals may exceed the overall number of respondents.

Similarly, some respondents made their comments via more than one method so the totals for how comments were made is greater than the total number of comments received.

The assessment of responses is high level and focuses on the main issues raised, rather than the number of representations to any individual question.

## Overview of responses

A total of 10,418 comments were received to the consultation from 3,678 respondents.

These respondents are from a wide variety groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other local authorities and Parish/Town Councils.

It should be noted that the numbers included under the 'Key statistics' sections in this feedback report, and the number of responses received to each question will not amount to the totals set out above as people did not have to answer every question.

Comments by respondent type:

Type of Respondent	Explanation	Number of Respondents
Duty to Co-operate (DTC) bodies	Key bodies consulted on strategic matters, including Essex County Council, adjoining local authorities, Historic England, Natural England, Environment Agency	17
Specific bodies/groups	Parish/Town Councils, utility bodies, health and transport consultees etc	24
General and Other bodies/groups	Voluntary groups, religious groups, housing providers, businesses etc	27
Developers/landowners	Landowners, promoters of land and their agents	61
Public	Individual members of the public	3484

## How people made their comments:

Method of making comments	Number of Comments	Percentage
Online Consultation Portal	410	3.9%
E-mail	9877	94.8%
Letter	131	1.3%

Higher than the anticipated/normal number of e-mails were received, due to comments being sent via email from 'Say no to Hammonds Farm' - a coalition of Boreham, Sandon, Danbury and Little Baddow Parish Councils, expressing opposition to new development at Strategic Growth Sites 16a Chelmsford East Garden Community and 16b Land Adjacent to A12 Junction 18 Employment Area.



All the comments received can be viewed in full on the Council's [planning policy consultation portal](#).

When viewing the portal, you will see the list of recent consultation events. Events which are open for consultation show a green timeline and the word 'open'. Those which are closed show a red timeline and the word 'closed'.

To view comments, you need to:

- Choose the event you would like to view comments for
- Select 'learn more' to open the event page
- Click on the 'what people say' tab to display a list of all the comments.

You can read all comments, or sort by name or date we received them. Where additional information such as reports or maps were submitted with a comment, these are listed at the end of the comment in PDF format, and can be viewed or downloaded.

Responses to Preferred Options consultation included in the complete version of the full document are prefixed PO24. Responses to the stand-alone questionnaire are prefixed POQ24. You can find out more about using the consultation portal in our [guidance notes](#).

## Monitoring Questions

Two optional monitoring questions were included in the consultation. This was to help us understand the reach of the consultation and inform future engagement activities.

Optional Monitoring Question	Number of Responses	Yes	No
OM1. Are you a resident within the Chelmsford City Council area?	193	104	89

If you answered yes, please select the settlement which you live in or near to:	Number of Reps
Bicknacre	23
Boreham	0
Broomfield	1
Chatham Green	0
Chelmsford Urban Area	7
Danbury	8
Downham	0
East Hanningfield	20
Edney Common	0
Ford End	15
Galleywood	0
Good Easter	0
Great Baddow	0

Great Leighs	3
Great Waltham	1
Highwood	0
Howe Green	0
Howe Street	0
Little Baddow	3
Little Waltham	0
Margaretting	0
Ramsden Heath	0
Rettendon Common	0
Rettendon Place	0
Roxwell	0
Runwell	0
Sandon	2
South Woodham Ferrers	3
Stock	0
West Hanningfield	0
Woodham Ferrers	0
Writtle	0
Other	12

<b>Optional Monitoring Question OM2 How did you hear about the consultation?</b>	<b>Percentage</b>
Direct notifications email/letter	59.3%
Chelmsford City Council website	27.1%
Social media	10.9%
Local Plan newsletter	4.5%
Parish Council website/newsletter	9.5%
Newspaper advert	0.5%
Poster	9.5%
Attended a Local Plan exhibition	1.8%
Word of mouth	8.6%
Other	1.4%

Note: The percentage total exceeds 100% as respondents were able to select more than one answer.

### Section 3: Main Issues Raised in Consultation Responses

A brief overview of the content of each section of the consultation document is set out below, followed by a high-level summary of the main issues and suggested changes received in the Preferred Options Local Plan document order.

We have specified who has made comments from public sector bodies, infrastructure or service providers and developers/landowners in brackets at the end of relevant bullet points. This is because it is useful to understand the nature of respondents, particularly where a stakeholder has a legal duty or responsibility over a matter that they are making comments about. We have not specified who has made comments from members of the public as to do so would result in a very long report, so bullet points from the public do not have brackets. It should be noted that in some cases, members of the public raised similar points to stakeholders. This is especially the case in relation to comments made by Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group to Strategic Growth Sites 16a (Hammonds Farm) and 16b (Junction 18 of the A12) which have been replicated and amplified by many individuals. To avoid duplication, these comments have not been repeated in the public comments.

All the comments received can be viewed in full on the Council's [planning policy consultation portal](#).

Key statistics are included at the top of each section. Where relevant these include the number of yes/no responses and the number of written comments received to.

#### **Foreword**

This section of the consultation document provides a foreword from the Leader of the Council. Miscellaneous comments that do not relate to a specific or obvious section of the consultation document have been summarised here.

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Foreword	3	0	3	3

Summary of Representations – main issues and suggested changes:

- Supportive of focus on climate action in response to the Council's declared climate and ecological emergency in 2019 and proposed work towards reaching net zero by 2030 (CNG Fuels)
- Supportive of the spatial strategy and policy approach to climate change and the multi-functional benefits of green and blue infrastructure. Some limitations which need to be addressed within the Local Plan regarding sustainable and resilient growth and infrastructure capacity. In terms of locating growth where there is headroom to accept and treat additional flows at our water recycling centres within existing permits, and where new infrastructure is provided, the

quantum of growth means carbon efficiencies can be achieved. Ongoing engagement will continue (Anglian Water)

- Add reference to a new sports stadium to be an aspiration and supported in principle within the Local Plan. Current Melbourne Park venue, used primarily by the Athletics Centre and Football Club, is not ideal as a shared facility for either sport.

## **Introduction**

This section of the consultation document describes the consultation document and key information about the review process.

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Introduction	4	4	40	40

Summary of Representations – main issues and suggested changes:

- Document needs to be re-ordered in policy sequence and is too long and repetitive
- Several obstacles in the way for residents to respond including that the portal is overly complicated and a short consultation period
- Papers published one week before the Policy Board meeting did not give adequate time to review
- Consultation deadline should have been extended to allow for additional meetings following announcement of the General Election (Great Baddow Parish Council)
- Welcome continued engagement with CCC in relation to the authorities' respective local plan preparation (Southend Borough Council)
- Support the allocation of sites for Gypsy, Traveller and Travelling Showpeople housing needs (Basildon Borough Council)
- Development in Growth Area 3 could impact on the need for infrastructure within Basildon Borough. Regular Duty to Co-Operate meetings requested to ensure that any emerging cross boundary issues are fully discussed and addressed (Basildon Borough Council)
- Cumulative traffic impacts could occur, especially along the A130 and A1245 towards the Fairglens interchange and the A12 towards J28 of the M25. Encourage collaboration with the local Highway Authority and National Highways to identify potential road network impacts for the IDP and plan policies (Rochford District Council, Brentwood Borough Council)
- Support the proposed Strategic Priorities and policies and recommend Statement of Common Grounds at the appropriate stage (Rochford District Council, Brentwood Borough Council)
- Chelmsford has engaged with us through the Duty to Co-operate, we are content with the contents and accuracy of the plan and satisfied it would be in general conformity with the basic conditions (Braintree District Council)

- Two cross boundary issues not adequately reflected in the plan are sustainable connectivity with South Essex and Thames Freeport. This requires joint working between South Essex authorities through SEC, CCC and ECC (Castle Point Council)
- Amend para. 1.35 to clarify that ECC is not required to be consulted on all non-mineral related development proposed within Safeguarded Areas (Essex County Council)
- Amend para. 1.39 to clarify that ECC is not required to be consulted on all non-waste related development proposed within Waste Consultation Areas (Essex County Council)
- Amend para. 1.42 to refer to ECC documents required to be submitted with planning applications and update the Council's Local Validation List to list these (Essex County Council)
- Non-Technical summary appears missing from the HRA (Natural England)
- Plan should draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups (Historic England)
- Work with your neighbours including London to ascertain whether any unmet needs will arise which will impact on the demand for new homes in Chelmsford (Home Builders Federation)
- Evidence base documents will require updating to reflect the change in circumstances, such as landscape, sustainable accessibility mapping, further IIA work and Infrastructure and Viability Report (Gladman Development Ltd)
- Refer to the South East Marine Plan remit which ranges from Mean High Water Springs (MHWS) or the tidal limit out to the territorial limit (Marine Management Organisation)
- The Chelmer Valley landscape is of great interest, and, through its association with Baker's writing, it can now also be regarded as nationally significant cultural landscape (Chelmer Valley Landscape Group)
- Continue to engage with the NHS and ICB on the Infrastructure Delivery Plan (IDP). Appropriate healthcare costs should be factored into the Local Plan Viability Assessment for relevant typologies (NHS Property Services Ltd)
- More needed on sustainability and reducing litter/waste
- More services/facilities should be provided in the town centre for youth groups.

### **About Chelmsford**

This section of the consultation document sets out the key challenges and opportunities to address over the plan period to 2041.

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
About Chelmsford	6	1	12	12

## Summary of Representations – main issues and suggested changes:

- The Great Eastern mainline rail route (GEML), Elizabeth line and A12 provide key strategic transport links and important commuting flows in both directions. (Transport for London)
- New green and blue infrastructure should accord with our Green Infrastructure Framework - Principles and Standards for England. Add references to protecting and enhancing the natural environment (Natural England)
- Reference the Essex Local Nature Recovery Strategy in paras 2.38, 2-39, 2.42 (Natural England)
- Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, Rights of Way Improvement Plans, Green Infrastructure Strategies and Nature Recovery Network (Natural England)
- Amend para. 2.14 to (i) add a reference the growing population of people with disabilities (ii) clarify that the growing and ageing population also covers Chelmsford as part of Central Essex and (iii) to add additional references to sustainable transport opportunities (Essex County Council)
- Amend Figure 6 and para. 2.23 to refer to the Great Eastern Mainline connections to Colchester, Ipswich and Norwich (Essex County Council)
- Comment from landowner/developer suggesting that their proposed development site will accord with the preferred plan/spatial strategy (Saxtons 4x4)
- Support key strategic objectives of the authorities to provide sufficient new homes (Mrs Mary Rance)
- Supportive of the Council key objectives
- Figure 15 misrepresents the size of the distance SWF is from The Dengie
- Urban area should be the focus for any new development.

## What are our Strategic Priorities

This section of the consultation document sets out the Strategic Priorities which are the key priorities that the Local Plan is based on.

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
What are our Strategic Priorities	20	11	50	50

Main issues are listed under the Strategic Priority they relate to. The abbreviations in the sub-headings below relate to the Strategic Priorities as follows:

<b>SP1</b>	Strategic Priority 1	Addressing the Climate and Ecological Emergency
<b>SP2</b>	Strategic Priority 2	Promoting smart, active travel and sustainable transport
<b>SP3</b>	Strategic Priority 3	Protecting and enhancing the natural and historic environment, and support for an increase in biodiversity and ecological networks

<b>SP4</b>	Strategic Priority 4	Ensuring sustainable patterns of development and protecting the Green Belt
<b>SP5</b>	Strategic Priority 5	Meeting the needs for new homes
<b>SP6</b>	Strategic Priority 6	Fostering growth and investment and providing new jobs
<b>SP7</b>	Strategic Priority 7	Creating well designed and attractive places, and promoting the health and social wellbeing of communities
<b>SP8</b>	Strategic Priority 8	Delivering new and improved infrastructure to support growth
<b>SP9</b>	Strategic Priority 9	Encouraging resilience in retail, leisure, commercial and cultural development

## **SP1**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Southend Borough Council, Rochford District Council, Chignal Parish Council, North Chelmsford Villages Community Group, Anglian Water Services Ltd, Sport England, Rosehart Properties, Hammonds Estates and Wates Developments, CNG Fuels, Dominus Chelmsford Ltd, Croudace Homes)
- Support the increased emphasis on addressing climate change and sequence of priorities (Broomfield Parish Council)
- Add emphasis on climate resilience, particularly in terms of flood risk management and move reference to the 10-year tree planting campaign under priority 3 (Anglian Water Services Ltd)
- Add reference to the Essex Local Nature Recovery Strategy in combating climate change, the role of nature-based solutions and the whole catchment approach to managing water resources (Natural England)
- Add reference to the remit of the South East Marine Plan remit and requirement of a marine licence (Marine Management Organisation)
- Support priority but it will not be achieved through housing allocations beyond the Green Belt away from the city. Undertake a Green Belt Review to identify more sustainable development options (Vistry Group)
- Plan does not have sufficient regard to the Council's wider corporate responsibilities including the aims of the Waterways Working Group (Vistry Group)
- The requirement for net zero development must be considered in terms of overall impact on development viability as the Local Plan continues (Dandara Eastern, Dandara) and align with national policies and regulations (Higgins Group, Hill Residential).

## **SP2**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Essex County Council, Sport England, Rochford District Council, Chignal Parish Council, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, CNG Fuels, Dominus Chelmsford Ltd, Croudace Homes)
- Amend para. 3.6 to refer to ECC's Safer Greener Healthier campaign (Essex County Council)
- Hammonds Farm is not the most sustainable location with regards to transport connections and facilities available within the immediate community and does not fully accord with this priority (Dandara Eastern)
- Plan should prioritise development to areas which are already in sustainable well-connected locations (Dandar, Obsidian Strategic, Hill Residential) and avoid isolated development proposals (Higgins Group)
- Priorities should support opportunities to enhance the sustainability of existing service villages in line with the NPPF
- Support for promoting and encouraging active and sustainable travel but need to overcome barriers e.g., badly maintained pavements, pavement parking and scooting, bike thefts, poor and costly bus services
- Support expressed from public.

## **SP3**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, Environment Agency, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, Dandara, Hill Residential, Dominus Chelmsford Ltd, Croudace Homes)
- Ensure the plan is underpinned by up-to-date environmental evidence including local ecological networks and Local Biodiversity Action Plans. Explore opportunities for development to enhance ecological networks and ensure development decisions consider impact on soils. CCC is referred to various advice and guidance for more information (Natural England).

## **SP4**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Essex County Council, Writtle Parish Council, Chignal Parish Council, North Chelmsford Villages Community Group, Hammonds Estates and Wates Developments, Dominus Chelmsford Ltd, Croudace Homes)



- Revise to refer to re-using suitable excavated materials and the following guidance ‘The Definition of Waste: Development Industry Code of Practice; and The Waste Management’ (Environment Agency)
- Amend para. 3.22 to be consistent with the NPPF e.g., to refer to practical and environmentally feasible prior extraction (Essex County Council)
- Include reference to directing new development to locations close to existing or proposed local facilities, so that people can walk, cycle or use public transport and be less reliant on the car (Richborough)
- Move reference to ‘protecting the Green Belt’ into priority 3 (Broomfield Parish Council)
- Insufficient evidence available to support approach that exceptional circumstances do not exist to review Green Belt boundaries (Rosehart Properties)
- A Green Belt review is required to identify suitable development areas currently within the Green Belt and to provide a more balanced/sustainable Spatial Strategy (Vistry Group, Whirledge & Nott, Higgins Group, Croudace Homes, Hill Residential)
- Should assess opportunities for sustainable development in the Green Belt
- Ignoring the Green Belt skews development to areas which have already experienced significant growth.

## **SP5**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Essex County Council, Chignal Parish Council, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, Dandara, Higgins Group, Hill Residential, Dominus Chelmsford Ltd, Croudace Homes)
- Amend para. 3.24 to be consistent with the Strategic Housing Needs Assessment (SHNA) to refer to the significant demand for affordable housing, particularly rented affordable (Essex County Council)
- Add reference to meeting qualitative and quantitative housing needs in full in line with the NPPF (Richborough)
- Strengthen by referring to providing homes for those of working age to support the local economy (Hammonds Estates and Wates Developments)
- Strengthen ambition to meet the range of housing needs in full and make clear that growth is supported outside of Chelmsford (Obsidian Strategic Asset Management Ltd)
- Support expressed from public.

## **SP6**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, CNG Fuels, Dominus Chelmsford Ltd, Croudace Homes).

## **SP7**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, North Chelmsford Villages Community Group, Sport England, Rosehart Properties, Hammonds Estates and Wates Developments, Dominus Chelmsford Ltd)
- Insufficient consideration is being given to the health benefits of and creation of Public Rights of Way (PROWs) and bridleways (Essex Bridleway Association)
- Add that the built environment should prioritise safety, particularly for young women and girls, to create a more inclusive environment. Add reference to stewardship to reflect the Garden Community allocations (Hammonds Estates and Wates Developments, Croudace Homes).

## **SP8**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, Essex County Council, Environment Agency, North Chelmsford Villages Community Group, Sport England, Anglian Water Services Ltd, Rosehart Properties, Hammonds Estates and Wates Developments, Dominus Chelmsford Ltd, Croudace Homes)
- Amend para.3.39 to provide reassurance that the Preferred Option represents the best option in transport terms (Essex County Council)
- Add reference to support the shift to a low carbon community, prevent worsening congestion and encourage a variety of modes of travel behaviours (Hammonds Estates and Wates Developments)
- Include references to facilities and police, ambulance & fire & rescue (Essex Police)
- Support reference to service providers within this priority (Hill Residential)
- Expand para. 3.37 to refer to a sufficient rolling supply of employment land, meeting local and wide strategic needs and allocating new employment areas (Greystoke GB)
- The Spatial Strategy focuses pressure on existing infrastructure to a few limited locations. Exceptional reasons exist to justify a Green Belt review to identify sustainable Green Belt development locations (Whirledge & Nott, Croudace Homes)

- Traffic modelling needs to provide evidence that the A132 and B1012 has been modelled to include all the traffic from the Dengie to 2041.

## **SP9**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, Dominus Chelmsford Ltd)
- The Council’s Plan for Improving Rivers and Waterways should have a greater prominence given that significant change is planned to the River Chelmer during the plan period (Hammonds Estates and Wates Developments, Croudace Homes)
- Include actions to repair and increase the sea wall height around SWF by 2041.

## **Other**

Summary of Representations – main issues and suggested changes:

- The three priority groupings (climate, growth and place) effectively balance the demands of the planning system and provide coherent plan priorities (Basildon Borough Council)
- Add additional priority to pursue opportunities to enhance the sustainability of existing service villages to prevent them from stagnating (Croudace Homes)
- Plan policies and site allocations are not based on accurate evidence or NPPF complaint (Vishal Sharma PO24-9579).

## **Our Vision and Spatial Principles**

This section of the consultation document describes the long-term Vision and Spatial Principles for managing and accommodating growth within Chelmsford up to 2041 and beyond.

### **Vision for Chelmsford**

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Vision for Chelmsford	7	5	21	21

Summary of Representations – main issues and suggested changes:

- Support (Essex County Council, Anglian Water, Broomfield Parish Council, Chignal Parish Council, North Chelmsford Villages Community Group, Dandara, Basildon Borough Council, Dominus Chelmsford Limited, CNG

Fuels Limited, Sport England, Wates Developments and Hammonds Estates LLP)

- Avoid repetition by translating into a broader statement around sustainable growth and addressing the climate and ecological emergency (Anglian Water)
- Add two additional bullet points to celebrate, conserve and enhance the City's rural hinterland, and to maximise the opportunities of the countryside for healthy leisure activities, tranquillity and wellbeing (Broomfield Parish Council)
- Expand to encompass providing better village bus services and improving the safety of rural roads to encourage cycling and walking. Rural employment sites should be accessible by sustainable means of transport (Chignal Parish Council)
- Expand to support our vibrant urban centres and very rural areas. Add new bullet on the health benefits of environmental tranquillity (North Chelmsford Villages Community Group)
- Explain how the bullet points relate to the vision and strategic priorities and will be used in future decision making (Hill Residential Ltd, Higgins Group, Dandara)
- Include reference to Green Belt (Higgins Group)
- Expand to refer to guiding growth towards a more sustainable community (Rosehart Properties Ltd, Croudace Homes)
- Amend to support opportunities to decarbonise the HGV sector (CNG Fuels Limited)
- Hammonds Farm is separated from the City by the A12 and contrary to the Vision. There are also questions over its deliverability (Dandara Eastern)
- Expand bullet 2 to support the logistics sector (Greystoke CB)
- The plan vision and our vision for Hammonds Farm strongly align. Enhance by referring to safety in bullet 10, the creation of new forms of connectivity in bullet 5, and by clarifying what is meant by modal shift (Wates Developments and Hammonds Estates LLP)
- Expand bullet 9 to refer to multifunctional green/blue infrastructure (Essex County Council)
- Expand bullet 9 to include reference to police facilities (Essex Police)
- Add new bullet to deliver Biodiversity Net Gain and wider environmental net gains, that forms an important component of nature recovery (Essex County Council)
- Do not support. Vision should acknowledge that development needs are to be met in full, including for housing (Richborough, Obsidian Strategic Asset Management)
- Various comments from landowners/developers suggesting that their proposed development sites will accord with the preferred Vision.

## Spatial Principles

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy S1 - Spatial Principles	27	11	59	59

Summary of Representations – main issues and suggested changes:

- Support expressed (Essex County Council, Anglian Water, Chelmer Housing Partnership, Cliffords Group Ltd, Tritton Farming Partnership LLP, Cliffords Group Ltd, Dominus Chelmsford Limited, Dandara Eastern, Wates Developments and Hammonds Estates LLP, Mr J Bolingbroke, Bloor Homes (Eastern), C J H Farming Ltd, Chignal Parish Council, Miscoe Enterprises Ltd, Tritton Farming Partnership LLP, Dandara Eastern, This Land, Hill Farm (Chelmsford) Ltd, A.G. & P.W.H Speakman, The Bucknell Family, Crest Nicholson, Dandara, Richborough, Pigeon (Sandon) Ltd, Daniel James Developments, Chris & Helen Copping, Martin Grant Homes)
- Support all except e. The settlement hierarchy is not a robust basis for identifying sustainable development locations. Amend to enable settlements outside the Green Belt to protect or create local services through targeted development, where appropriate (Broomfield Parish Council)
- Part c - Brownfield land may have high value for invertebrates and ecological surveys should be carried out to inform allocations and planning decisions (Natural England)
- Providing housing should be given more prominence and weight in the plan (Chelmer Housing Partnership)
- Disagree/concern expressed to part b. A Green Belt review is required to identify sustainable development opportunities in the Green Belt (Hill Residential Ltd, Higgins Group, Vistry Group, Whirledge & Nott, Croudace Homes, Martin Grant Homes)
- Include reference to the presumption in favour of sustainable development (Martin Grant Homes)
- Amend e to include identifying sustainable growth opportunities within the Green Belt which respect the development pattern and settlement hierarchy (Whirledge & Nott, Croudace Homes)
- Expand e to also include service settlements e.g., Ford End which is proposed for new development (Dandara)
- Hammonds Farm is contrary to the principles (Obsidian Strategic, Dandara Eastern)
- The former BAE site should be allocated as a Special Policy Area (SPA) to guide its future redevelopment (Rosehart Properties Ltd)
- Place more emphasis on previously developed land (Dominus Chelmsford Limited)

- Expand h to include low carbon transport related infrastructure close to strategic transport junctions (CNG Fuels Limited)
- Plan proposals and site allocations fail to apply the principles in practice (Dandara Eastern, Vistry Group)
- Swap paras. 4.15 and 4.16 or merge h and i. Actively engaging with partners in 4.16 should apply to all new development not just significant new greenfield housing development (Wates Developments and Hammonds Estates LLP)
- Recommend an additional principle around integrating strategic green infrastructure with ecological networks and the wider landscape to deliver multiple environmental, social and economic benefits (Essex County Council)
- Object to plan reliance on the proposed garden communities, raising concerns over delivery in the early years of the plan period and disproportionately skewing new growth up to 2041 (Crest Nicholson)
- Expand supporting text of h and i to include references to police facilities (Essex Police)
- Various comments from landowners/developers suggesting that their proposed development sites will accord with the preferred Spatial Principles
- Do not agree. Need to include protection of Grade 2 agricultural land
- Parts a, h and I – for the policy to succeed it needs a strategy to link SWF to Chelmsford by regular public transport.

### **Creating Sustainable Development**

This section of the consultation document sets out Strategic Policies which underpin and guide the Spatial Strategy by addressing climate change, promoting social inclusion, conserving and enhancing the historic and natural environment and safeguarding community assets.

#### **Strategic Policy S2 – Addressing Climate Change and Flood Risk**

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy S2 – Addressing Climate Change and Flood Risk	13	5	36	36

Summary of Representations – main issues and suggested changes:

- Support expressed for policy (Natural England, Anglian Water Services Ltd, Crest Nicholson, This Land, Essex County Council, Wates Developments and Hammonds Estates LLP, Obsidian Strategic Asset Management Ltd, C J H Farming Ltd, Chelmsford & Central Essex RSPB Local Group, Sport England, Chris & Helen Copping, Pigeon (Sandon) Ltd)
- Add direct reference to our Green Infrastructure Framework and recognition of Green Infrastructure’s role in strengthening climate change resilience (Natural England)

- Ensuring new development minimises flooding impact should be more ambitious towards delivering resilient growth and addressing opportunities for new strategic development to provide betterment in terms of flood risk (Anglian Water Services Ltd)
- Support expressed but emission reduction targets should consider the forthcoming 2025 Future Homes Standards (FHS) and not set a policy expectation that cannot be delivered and create viability issues. Review the viability assessment to consider Ministerial Statement 'Local Energy Efficiency Standards Update' and Government's appraisal of the FHS. Amend policy to 'encourage' net zero emissions 'as encouraged' by DM31 (Chelmsford Garden Community Consortium, Vistry Group)
- Support expressed but optimise housing densities to reflect additional costs and constraints of Net-Zero carbon new homes on developers (Dominus Chelmsford Limited)
- Concern that net zero requirements is being applied retrospectively to existing allocated sites (Hopkins Homes Ltd)
- Requirements go beyond current policy and guidance, may impact viability and deliverability of residential development, are not justified by the evidence base (Whirlledge & Nott, Hopkins Homes Ltd) and are inappropriate as standards will change/evolve over the plan period (Hill Residential Ltd, Higgins Group, Dandara, Dandara Eastern). Policy requirements should instead be ambitions and applied flexibly (Croudace Homes, Whirlledge & Nott)
- Do not support. Exceeding Building Regulations Part F and L is unsound. Relying on building regulations should be considered a policy reasonable alternative as it is the preferred approach by government (Home Builders Federation)
- The South East Marine Plan policies such as SE-EMP-1 should be used as evidence to support the local plans policies (Marine Management Organisation)
- Add reference to the South East Marine Plan remit and requirements for marine licences (Marine Management Organisation)
- Recommend reference to the marine/coastal/intertidal element of the policy area, particularly where both terrestrial and marine habitats have the potential to be impacted by the policy (Marine Management Organisation)
- Reference the name of the future flood resilience scheme in the policy (Environment Agency)
- Add additional bullet to assist the delivery of net gain for biodiversity that will restore our ecosystems and deliver mitigation and adaptation benefits (Essex County Council)
- Include actions to repair and increase the sea wall height around South Woodham Ferrers by 2041
- Policies should set out appropriate nature-based solutions for climate mitigation and adaptation such as woodland or wetland creation or peatland restoration. Consider the Climate Change Adaptation Manual, Carbon Storage

and Sequestration by Habitat and National biodiversity climate change vulnerability model (Natural England)

- Addressing climate change must be compatible with other planning objectives including housing delivery (Gladman Developments Ltd)
- Add support for the decarbonisation of the road freight industry (CNG Fuels Limited)
- Support expressed but amend to direct growth to sustainable settlements to reduce travel by private car and promote active travel modes of transport, and to locations served by new strategic infrastructure including the Chelmsford North East Bypass (Bloor Homes (Eastern))
- Policy should support viable housing delivery and allow for site-specific Viability Assessment at the planning application stage (Bloor Homes (Eastern))
- The Exception Test should describe that 100% of the built development (for vulnerable uses) at Hammonds Farm is in Flood Zone 1, outside of the floodplain. The new Garden Community will incorporate measures to mitigate flood risk both within and off-site in all flood zones (Wates Developments and Hammonds Estates LLP)
- There is a discrepancy between the Environment Agency Peak Rainfall allowance and the SFRA 1. According to the Environment Agency, Table 4-2 in the SFRA Level 2 should be in accordance with the table submitted alongside this comment (Wates Developments and Hammonds Estates LLP)
- Various comments from landowners/developers suggesting that their allocated or proposed development sites will accord with this policy
- Plan does not acknowledge CO2 emissions from the construction industry
- Plan must contain a policy requiring all new development, where practical, to install solar panels on roofs.

#### Strategic Policy S14 - Health and Wellbeing

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy S14 - Health and Wellbeing	14	2	30	30

Summary of Representations – main issues and suggested changes:

- Support policy and welcome reference to Sport England Active Design Principles (Sport England)
- Support expressed (Essex County Council, Anglian Water, Mid and South Essex Integrated Care Board (ICB), Wates Developments and Hammonds Estates LLP, Cliffords Group Ltd, Hill Farm (Chelmsford Ltd), Dominus Chelmsford Ltd)
- Amend to reference that tranquil landscapes can support mental health and wellbeing (Broomfield Parish Council)



- Define what is meant by an initial assessment to make the text clear that all larger scale developments should be the subject of a health impact assessment (Mid and South Essex Integrated Care Board (ICB))
- A site level HIA would repeat the plan IIA. HIAs may only be appropriate for larger unallocated sites where the impacts may not have been fully considered through the plan HIA (Home Builders Federation)
- Policy needs to be flexible, not every development will achieve each requirement given site constraints and characteristics. Add clarity on how a decision maker balances requirements when judging development proposals (Hill Residential Ltd and Higgins Group)
- Concern that requirements e.g., Livewell Development Accreditation Scheme, Sport England and National Design Guide Active Design principles are outside of the Local Plan process and subject to change without the same consultation and examination as other requirements (Hill Residential Ltd)
- Concern on how the viability of the policy has been considered (Hill Residential Ltd)
- Concern about the level of engagement needed with health care providers and identifying and delivering requirements in a timely manner to not delay developments (Hill Residential Ltd and Higgins Group)
- Suggest amendments to provide consistency and links with further guidance such as the Chelmsford Health and Wellbeing Plan, interconnectivity between the wider determinants of health, adaptable housing, Essex Design Guide and supplementary guidance (A New Development Model for Essex, October 2023) and Chelmsford Food Plan (2023) (Essex County Council)
- Policy does not address the needs of older people
- Healthcare facilities need to meet the needs of new communities.

### Strategic Policy S15 – Creating Successful Places

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy S15 – Creating Successful Places	1	2	11	11

Summary of Representations – main issues and suggested changes:

- Support as a key priority. Could refer to stewardship as well as place-keeping (Wates Developments and Hammonds Estates LLP)
- The policy aligns with developer’s own development principles and is supported (Dominus Chelmsford Limited)
- Add a reference to the importance of providing the right amount and type of employment and business opportunities, particularly in larger developments and garden communities (Essex County Council)
- Considerations are suggested to minimise fire risk and spread of fire, ensure safe access, and reduce risks to water sources (Essex County Fire and Rescue Service)

- Concern that the policy could pose an unnecessary planning burden on functional development and do not support design codes which will be inflexible in some circumstances (CNG Fuels Ltd)
- This policy is already covered by S14 (bullet 3) (Dandara Eastern) and repeats the NPPF (Dandara, Higgins Group, Hill Residential).

### Strategic Policy S3 – Conserving and Enhancing the Historic Environment

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy S15 – Creating Successful Places	6	1	10	10

Summary of Representations – main issues and suggested changes:

- Support (Historic England, Dominus Chelmsford Limited, C J H Farming Ltd, This Land, Pigeon (Sandon) Ltd)
- Recommend use of the South East Marine Plan policies as evidence to support the plan policies (Marine Management Organisation)
- Do not support. Delete ‘rare’ in reference to the canal water feature at Boreham House in para. 5.36 as this is misleading (CNG Fuels Limited)
- Policy wording should state the specific designated heritage assets on site and nearby, and specific mitigation measures identified in site Heritage Impact Assessments. Where there are impacts policies should read: "Development should conserve or where appropriate enhance the significance of heritage assets .... including any contribution made to their significance by their settings. Appropriate mitigation measure including ... will be required (Historic England).

### Strategic Policy S4 – Conserving and Enhancing the Natural Environment

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy S4 – Conserving and Enhancing the Natural Environment	8	6	31	31

Summary of Representations – main issues and suggested changes:

- Support for the policy (Environment Agency, Natural England, Wates Developments and Hammonds Estates LLP, Chelmsford and Central Essex RSPB Local Group, CJH Farming Ltd, Pigeon (Sandon) Ltd)
- The policy ambition for 20% BNG is welcomed (Anglian Water Services Ltd)

- Suggest referencing other relevant evidence documents and the Local Nature Recovery Strategy and Networks (Essex County Council, Anglian Water Services Ltd)
- Add a reference to our Local Character Landscapes study, which highlights important and distinctive rural landscapes which should be valued and protected (Chignal Parish Council)
- Local Plan could draw on policies in the South East Inshore Marine Plan (Marine Management Organisation)
- The importance of the underlying aquifer/groundwater resource should be noted, with references added to pollution and protection guidance (Environment Agency)
- Make the distinction between public green spaces and wildlife habitats, with greater focus on integrating biodiversity rather than segregation; planting and biodiversity features should use native species; and call for riparian corridors to maintain a buffer zone for public space rather than private gardens (Environment Agency)
- RAMS contributions are welcomed, but additional accessible greenspace may also be required (Natural England)
- Contributions are no longer required to be secured towards recreational mitigation measures at Hatfield Forest SSSI/NNR (Natural England)
- Protection of best and most versatile agricultural land should be strengthened to support food security and shorten supply routes (Broomfield Parish Council)
- Opposition to a requirement for 20% BNG on the Garden Community Sites as it exceeds national requirements, and has not taken the cumulative effect of this and required tree planting into account (Bellway Homes Ltd)
- Concerns about the deliverability of 20% BNG on large greenfield sites; the policy should be more flexible to express this as a target and not a requirement (Whirledge and Nott, Croudace Homes, Vistry Group)
- Clarification of the BNG provision is needed, e.g. is delivery per phase or for overall development; offsite provision may be more appropriate so greater flexibility is suggested (Chelmsford Garden Community Consortium)
- The requirement for 10% BNG on most development is welcomed; a higher percentage of BNG would need robust evidence (Obsidian Strategic Asset Management, Dandara Eastern, Dandara, Hill Residential Ltd, Dominus Chelmsford Limited)
- Higher BNG requirements should take account of viability considerations, and a take more realistic view of the costs than assumed in the evidence base, which appear to be too low (Dandara Eastern).

#### Strategic Policy S5 – Protecting and Enhancing Community Assets

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy S5 – Protecting and Enhancing Community Assets	8	1	15	15

Summary of Representations – main issues and suggested changes:

- Support for the policy as it recognises the importance of sports and leisure facilities in new development and the need to secure new provision through planning obligations or CIL (Sport England)
- The proposal that existing community assets will need to be protected from inappropriate changes of use or redevelopment is supported as this is necessary for meeting current and future community needs (Sport England)
- Support for the policy (Dominus Chelmsford Limited, Cliffords, Hill Farm (Chelmsford) Ltd, Dandara/Dandara Eastern, Obsidian Strategic)
- Add references in policy and para. 5.59 to safe and cohesive communities and the protection of police facilities (Essex Police)
- Policy could be extended to community coastal assets using the South East Marine Plan policies as evidence (Marine Management Organisation)
- Support for the provision of sufficient, quality community facilities but the policy should be more flexible to avoid unjustified delays to vital reinvestment in health facilities and services for the community. The disposal of no longer suitable or redundant healthcare sites and properties helps to fund new or improved services (NHS Property Services Ltd).

**How will Future Development Growth be Accommodated?**

This section of the consultation document sets out Strategic Policies which underpin and guide the Spatial Strategy including policies related to securing infrastructure and delivering growth.

**How will Future Development Growth be Accommodated? (paragraph 6.1)**

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Paragraph 6.1	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Add that the strategic policies in this section secure ‘facilities’ as well as infrastructure (Essex Police).

**Strategic Policy S6 – Housing and Employment Requirements**

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Policy S6 – Housing and Employment Requirements	19	24	74	74

## Summary of Representations – main issues and suggested changes:

- Support/some support for requirements and approach (Essex County Council, Basildon Borough Council, Rochford District Council, Brentwood Borough Council, Castle Point Council, Anglian Water Services Ltd, Broomfield Parish Council, S J R Farming, Hawridge Land, Dominus Chelmsford Limited, Obsidian Strategic Asset Management Ltd, Dandara Eastern, Cliffords Group Ltd, Wates Developments and Hammonds Estates LLP, Vistry Group, C J H Farming Ltd, Seax Development, Miscoe Enterprises Ltd, Home Builders Federation, This Land, Hill Farm (Chelmsford) Ltd, Van Diemans Property Company, Mrs A Mossman, A.G. & P.W.H Speakman, The Bucknell Family, Redrow Homes & Speakman Family, Crest Nicholson, Whirledge & Nott, Croudace Homes, Dandara, Pigeon (Sandon) Ltd, Daniel James Developments, Woosington One, Welbeck Strategic Land V Limited)
- Support supply buffer (Broomfield Parish Council, Wates Developments and Hammonds Estates LLP, Dandara)
- Use some supply buffer to target affordable homes for local people in perpetuity e.g., through a Community Land Trust (Broomfield Parish Council)
- Expand para 6.16 for employment growth and skills capacity to aim to match levels of housing growth to help reduce out commuting (Essex County Council)
- Request whether Chelmsford can accommodate any of their unmet housing need (Castle Point Council and Southend Borough Council)
- Amend Part A to read 'at least' 1,000 net new homes (Mrs A Mossman)
- Use updated annual housing requirement (913 as stated in Turley, March 2024) and give high priority to bring empty properties back into use (Danbury Parish Council)
- Explore a higher housing requirement to meet all the housing needs of the area's residents including those living in unsuitable accommodation and newly forming households (Tritton Farming Partnership LLP)
- Need to consider how the ageing population affects housing needs as there is a significant growing need for more specialist housing units (Opus Little Waltham Developments Ltd)
- Housing for older people should have its own requirements and standalone policy (McCarthy Stone)
- Include requirements for elderly persons within the policy. Allocated sites will not meet needs alone (Mrs Mary Rance)
- Increase requirements above the minimum Standard. Reasons cited include to deliver greater choice and more affordable housing, address the housing crisis, reduce reliance on windfall sites, help meet neighbouring area's unmet needs, past housing delivery records and the significant new infrastructure coming to the area (Hill Residential Ltd, Tritton Farming Partnership LLP, Higgins Group, Gladman Developments Ltd, Bloor Homes (Eastern), Richborough, Martin Grant Homes)

- Expand Table 1 to reflect the amendments made to the yields of existing allocations and increase supply buffer to 20% to address in part an historic under delivery of affordable housing (Richborough)
- Need a more balanced/diverse pool of allocations, including small-medium sites (Martin Grant Homes) which are not/less constrained by infrastructure burdens rather than relying on Garden Communities (Richborough, Welbeck Strategic Land V Limited)
- Based on previous delivery rates, apply a non-implementation rate to allow for an element of under-implementation (Obsidian Strategic Asset Management Ltd), allocate more housing sites (Dandara, Welbeck Strategic Land V Limited) and identify Green Belt and non-Green Belt reserve sites (Newell Properties Development Ltd)
- No evidence that windfalls will continue to come forward given likely declining opportunities within built up areas. Affordable housing delivery will likely be lower than required. There is no assessment of the potential for double counting with the 3,745 homes that have permission and are capable of being built out in the next 5 years and beyond (Martin Grant Homes)
- The Duty to Co-operate Statement is unclear on what co-operation has taken place in relation to housing delivery and any unmet housing needs (Obsidian Strategic Asset Management Ltd)
- Plan needs to allocate more sites that could deliver more quickly based on previous housing delivery records and given Hammonds Farm will come forward later in the plan period (Dandara Eastern, Welbeck Strategic Land V Limited)
- Until the Gypsy and Traveller Accommodation 2024, we are unable to comment on numbers (IBA Planning Ltd, Vistry Group)
- Reconsider if the large strategic allocations will meet Gypsy and Travellers and Travelling Showpeople needs within a reasonable timescale. Confirm if the Gypsy and Traveller Accommodation Assessment includes Roselawn Farm in the baseline (IBA Planning Ltd)
- Do not support/object to policy (IBA Planning Ltd, Vistry Group, Chelmsford Garden Community Consortium, Mrs Mary Rance, McCarthy Stone, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- The evidence base and planning logic for Hammonds Farm is questionable (Dandara Eastern)
- No need to allocate sites 16a and 16b and their potential benefits do not outweigh the significant adverse impacts. Alternative locations with less harmful impacts have not been properly considered. Hammonds Farm is not needed to address the area's housing requirements (as recommended by the Strategic Housing Needs Assessment). Existing employment allocations and commitments can meet minimum employment requirements, so Junction 18 of the A12 employment allocation is not needed (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- As Little Boyton Hall Farm Rural Employment Area (Location 15) is inaccessible by bus, walking or cycling it will lead to an increase in congestion on local roads (Chignal Parish Council)

- Spatial Strategy should support the rural and City economy and Chelmsford's status as a regional hub for employment (Hill Farm (Chelmsford) Ltd, Van Diemens Property Company)
- Encourage development of existing employment sites in sustainable locations given long lead-in times for large strategic site allocations (Rosehart Properties Ltd)
- Scenario 3 of the Employment Land Review (ELR) 2023 does not fully account for the planned growth in the economically active population
- The employment requirements are insufficient to meet the growing need of logistics in the area, given the locational advantages on the A12 corridor and the shift to larger warehouses and greater automation. In line with national policy, an objective assessment of the requirements of the logistics sector across the sub-region is required (Greystoke CB)
- Need to consider sites for employment in rural areas (The Bucknell Family)
- Spatial Strategy lacks a proportionate, district wide distribution of growth and infrastructure (Whirledge & Nott, Croudace Homes)
- Extend plan period to 2042/3 to allow for any timetable slippage and increase developments requirements accordingly (Gladman Developments Ltd, Greystoke CB)
- Various comments from landowners/developers promoting their proposed development sites will accord with the proposed Spatial Strategy
- There should be a high priority to bring empty properties back into use
- Support housing requirements
- Do not agree. An additional 4,000 homes are unnecessary, unsustainable, and make compliance with the Vision impossible.

### Strategic Policy 7 – The Spatial Strategy

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy 7 – The Spatial Strategy	21	32	144	144

Summary of Representations – main issues and suggested changes:

- Support/broad support expressed (Essex County Council, Anglian Water Services Ltd, Richard Speakman, Hawridge Land, Hallam Land Management, Cliffords Group Ltd, Gladman Developments Ltd, Wates Developments and Hammonds Estates LLP, Mr J Bolingbroke, C J H Farming Ltd, Seax Development, North Chelmsford Villages Community Group, Miscoe Enterprises Ltd, Cliffords Group Ltd, A.G. & P.W.H Speakman, The Bucknell Family, Redrow Homes & Speakman Family, Dandara, Pigeon (Sandon) Ltd, Daniel James Developments, Welbeck Strategic Land V Limited)

- Most new allocations will come forward from 2029 which will enable alternative wastewater treatment solutions to be developed where capacity is constrained (Anglian Water Services Ltd)
- Mostly support but using the Settlement Hierarchy to allocate future development is not effective or sustainable in practice. Delete references to the Settlement Hierarchy in the policy (Broomfield Parish Council)
- Delete requirement for GS9a to make a financial contribution to the Chelmsford North East Bypass as it is not needed (Essex County Council)
- Amend paras 6.43 and 6.49 and site policies to read that SGS6, 7, 8, 16a and b will help to deliver strategic infrastructure including the Chelmsford North East Bypass (Essex County Council)
- Amend para 6.24, bullet 1 to read 'Sustainable urban extensions of Chelmsford, Great Leighs and South Woodham Ferrers for new housing and employment' (Essex County Council)
- Add to all site policies infrastructure requirements to ensure wastewater treatment and disposal is available, including any required mitigation with the sewerage network (Environment Agency)
- After 'infrastructure' in line 2 of the penultimate paragraph add 'and facilities' (Essex Police)
- Site allocations and their respective policies need to be informed by Heritage Impact Assessments (Historic England)
- Reconsider if the large strategic allocations will meet Gypsy and Travellers and Travelling Showpeople needs within a reasonable timescale. Confirm if the Gypsy and Traveller Accommodation Assessment includes Roselawn Farm in the baseline (IBA Planning Ltd)
- Support rejection of Chatham Green and to expansion of SGS2 and SGS8 (Broomfield Parish Council)
- Expand reasons for rejecting expansion of Broomfield village to include landscape capacity and sensitivity, risk of settlement coalescence and primary school capacity concerns (Broomfield Parish Council)
- Agree with dismissal of alternative development sites (Wates Developments and Hammonds Estates LLP)
- Clarify in reasonable alternative text that significant expansion of North East Chelmsford is proposed during the plan period to 2041 (Wates Developments and Hammonds Estates LLP)
- There are no overriding constraints to the allocation of land at Junction 17 A12 (Greystoke CB)
- Enlarge Little Boyton Hall Rural Employment Area (Growth Site 15) and allocate for E(g)(i-ii) alongside B2 and B8 (C J H Farming Ltd)
- Requirements for masterplans on strategic sites should be on a site-by-site basis to reflect issues such as land use and landownership (C J H Farming Ltd, Pigeon (Sandon) Ltd)
- Object to 10 Traveller pitches for SGS6 (Chelmsford Garden Community Consortium) and additional travelling showpeople plot (Vistry Group)



- Unable to comment on Gypsy and Traveller requirements in absence of the Gypsy and Traveller Accommodation 2024 (Chelmsford Garden Community Consortium, Vistry Group)
- Reinstate adopted plan wording for around 1,200 new homes and around 1,000sqm of business floorspace for SGS10 (Vistry Group)
- Do not support/opposition expressed for policy (IBA Planning Ltd, Obsidian Strategic, Dominus Chelmsford Limited, Bloor Homes (Eastern), Vistry Group, Tritton Farming Partnership LLP, Dandara Eastern, This Land, Crest Nicholson, Mr Paul Hopkins, Richborough, ARU, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Mr and Mrs Andrew Parker, Mrs Fiona McCallum, Taylor Wimpey, Martin Grant Homes, Croudace Homes, Barratt David Wilson (Eastern Counties))
- Increase the housing requirement to help deliver more homes (Hallam Land Management), ensure development needs are met (Farming Partnership LLP, Newell Properties Development Ltd) and to address uncertainties with windfall sites (Urban Provincial, Martin Grant Homes)
- Proposed allocations fall short of housing requirements (Opus Little Waltham Developments Ltd)
- Housing trajectory is unrealistic without more allocations including within the Green Belt (Newell Properties Development Ltd)
- Existing allocated large-scale sites are not meeting the time-scales as predicted in the draft Plan (Dandara)
- The 20% buffer is largely formed by dwellings which are potentially undeliverable in the Plan period (Martin Grant Homes)
- Projected housing supply in the first five years is too ambitious and needs to be revised. Confirm status of allocated sites rolled forward to demonstrate delivery (Martin Grant Homes)
- Provide evidence to explain (i) how the preferred options were selected and (ii) the availability of services, functional relationships and sustainability used to inform the Settlement Hierarchy (Martin Grant Homes)
- Amend Settlement Hierarchy to read 'Chelmsford Urban Area'
- Allocate more small/medium housing and employment sites (Opus Little Waltham Developments Ltd, Richard Speakman, H R Philpot & Sons, Hill Farm (Chelmsford) Ltd, Van Diemans Property Company, Dandara, Mrs Carolyn Morling, Mr James Gardner, Bellway Strategic Land, Martin Grant Homes) including housing sites under 1ha (Tritton Farming Partnership LLP)
- Allocate a greater variety of site sizes cross more parts of the plan area including in/on the edge of Chelmsford Urban Area and in/around villages e.g., to ensure a more balanced distribution of growth and support rural areas and (Bloor Homes (Eastern), Seax Development, Gladman Developments Ltd, S J U 2016 discretionary settlement trustees, Dominus Chelmsford Limited, Hill Residential Ltd, Higgins Group, Miscoe Enterprises Ltd, Tritton Farming Partnership LLP, Bellway Homes Ltd, H R Philpot & Sons, Cliffords Group Ltd, Mr Graham Weal, A.G. & P.W.H Speakman, The Bucknell Family, Crest Nicholson, Mrs Carolyn Morling, Mr James Gardner, Taylor Wimpey, Martin Grant Homes, Barratt David Wilson (Eastern Counties))

- Provide Almshousing to help meet local affordable housing needs (Seax Development, Miscoe Enterprises Ltd)
- Provide housing for the elderly (J & T Wardrop and the Wardrop Trust) to meet local needs
- Plan needs a co-living policy (Highgate Capital Ltd)
- Review the Green Belt to identify the most sustainable strategy and sustainable Green Belt releases (Obsidian Strategic, Vistry Group, Mrs R Armstrong and Mr B Howard, H R Philpot & Sons, Newell Properties Development Ltd, Whirlledge & Nott, Croudace Homes, Taylor Wimpey, Martin Grant Homes, J & T Wardrop and the Wardrop Trust, Barratt David Wilson (Eastern Counties))
- Not undertaking a Green Belt Review has led to unsustainable development patterns e.g., increased journey times to the City Centre, a lack of community infrastructure in areas and poor cohesivity with existing communities (Barratt David Wilson (Eastern Counties))
- Allocate additional/expand existing employment sites (including in the Green Belt) to provide flexibility and support existing employment areas/businesses (S J R Farming, Hill Farm (Chelmsford) Ltd, Saxtons 4x4)
- Policies S7, S8 and S11 should more clearly support rural businesses changing, expanding, adapting and improving to avoid disagreements at planning application stage (Strutt & Parker)
- Review of the role of the Green Wedge to promote active travel corridors and improve accessibility of the Green Wedge to areas of wildlife/ecological value (Cliffords Group Ltd)
- Review the Green Wedge to establish areas of land that serve little contribution to the role and function of the Green Wedge and to identify the most sustainable development options (Miscoe Enterprises Ltd, Hill Farm (Chelmsford) Ltd, Mr Graham Weal, The Bucknell Family, Mr Paul Hopkins)
- Plan is too reliant on large strategic sites (e.g. Garden Communities) making it inflexible/unreliable. There are delivery and viability risks/issues with such sites, long lead in times and the housing trajectory is over ambitious (Urban Provincial, Opus Little Waltham Developments Ltd, Richard Speakman, Hill Residential Ltd, Obsidian Strategic, Tritton Farming Partnership LLP, Bloor Homes (Eastern), Dandara, Bellway Homes Ltd, This Land, Dandara, Martin Grant Homes, Bellway Strategic Land, Martin Grant Homes, Croudace Homes, Welbeck Strategic Land V Limited, Barratt David Wilson (Eastern Counties))
- Concern/objection to Hammonds Farm allocation. Comments cited include previously scored poorly, physically and spatially detached from Chelmsford, requires significant infrastructure investment and too optimistic modal shift targets. More sustainable, accessible locations have been dismissed (Dandara, Bellway Homes Ltd, This Land, Bellway Strategic Land, Croudace Homes, Barratt David Wilson (Eastern Counties), Gladman Developments Ltd, Vishal Sharma)

- Council has ignored its evidence base (Croudace Homes) including by selecting Hammonds Farm over better performing sites (Mr and Mrs Andrew Parker)
- SGS16a and b are not needed to meet the area's housing and employment requirements; are in unsustainable and inaccessible locations; would have significant adverse impacts that cannot be adequately mitigated including on flood risk, highway network, landscape, heritage, loss of agricultural land, wildlife, ecology and minerals safeguarding; are situated within a highly sensitive setting; would significantly impact multiple Parishes and contradict relevant 'made' and emerging Neighbourhood Plans, and are premature as the land is a potential new area for a 'National Landscape' designation (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Croudace Homes)
- There is large-scale public objection to Hammonds Farm and there have been no changes since the plan adoption to warrant removing the land's current level of high protection (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- The proposed benefits of the Hammonds Farm development (e.g. new country park) do not outweigh the harm; the Council's evidence base is questionable/unsound and not all impacts have been properly assessed. More sustainable options to SGS16a and have been rejected without proper interrogation including the continued expansion of NEC, smaller-scale allocations across the Settlement Hierarchy and Green Belt development through a review. A landscape assessment, heritage assessment, flood risk statement and transport technical note are submitted alongside the representation (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- Hammonds Farm would be a long-term option and commencing before completion of North East Chelmsford will split available infrastructure funding and market interest. The Spatial Strategy fundamentally departs from the adopted Local Plan and 'made' Neighbourhood Plans, and the rationale for this 'U'-turn is unclear and unjustified (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- Separation between Chelmsford and Danbury would largely disappear with Hammonds Farm contrary to the Spatial Principles (The Danbury Society)
- Hybrid Spatial Strategy options were not part of the consultation (The Danbury Society)
- Constraints at SGS6 and Great Leighs SGS7 (e.g. heritage, Critical Drainage Area) could delay delivery (Wates Developments Limited, Urban Provincial)
- Splitting the Settlement Hierarchy by Outside and Within the Green Belt is not justified and fails to reflect development opportunities across the plan area (Hill Residential Ltd, Higgins Group)
- South Woodham Ferrers should be its own category in the hierarchy given its scale and service provision
- Delete requirement for proposals within Special Policy Areas to be considered against an approved masterplan as education priorities date quickly requiring

regular costly updates. Instead assess proposals against prevailing plan policies (ARU)

- Spatial Strategy should specifically recognise the needs of the logistics sector in Chelmsford (Greystoke CB)
- Increase capacity of GS17b to at least 30 dwellings in line with the SHELAA (Mrs A Mossman)
- Expand allocations 3b, 3c and 3d at East Chelmsford (Redrow Homes & Speakman Family)
- Expand 14b for 50 homes (Dandara)
- 20 units at 11c fails to make effective use of land. Allocate for more homes to help deliver improvements to local services and facilities (Welbeck Strategic Land V Limited)
- Increase allocation for Danbury. Question suitability of allocating through the Neighbourhood Plan which is not time-controlled risking delayed site delivery (Richborough)
- Provide more flexibility on growth outside settlement limits (Park View Group)
- Various comments from landowners/developers/promoters promoting that their proposed development sites should be allocated in the Spatial Strategy and added to the Key Diagram
- Various comments disagreeing with the Council's SHELAA 2024 site assessment methodology and/or scoring of their submitted sites
- The A132/B1012 Improvements fail to consider the increase in traffic flows from the development to the east of SWF
- The Secretary of State regarded about 1000 homes acceptable for SGS10
- Better to build on brownfield land or the edge of large towns
- Consider traffic impacts of RHS Hyde Hall Special Policy Area which will be improved/enlarged causing increased traffic on Willow Grove
- Support expressed including protection of the Green Wedge and Green Belt
- Opposition expressed e.g., development proposals will spoil the countryside, adversely impact on road safety and congestion
- Build on brownfield land or the edge of large towns
- Opposition expressed to Hammonds Farm allocation. Reasons include it is not properly evidenced or justified; loss of agricultural land; more sustainable locations are available; lack of existing infrastructure; landscape, biodiversity and heritage impacts, increased traffic impacts and congestion; no guarantee that the development and infrastructure can be delivered in the time scale; shortage of GPs; pollution; detached from Chelmsford; not close to new and existing transport infrastructure such as the new bypass; would require disproportionate investment in highways infrastructure, and lack of existing utility provision
- There is no advantage to Hammonds Farm over North East Chelmsford
- Hammonds Farm should not be the sole major growth area
- Need to undertake a Green Belt Review to identify sustainable new housing Green Belt settlements to sustain their vitality and services

- Unclear why expansion of North East Chelmsford is no longer deliverable since the Issues and Options consultation
- There is nothing to prevent mineral extraction and housing development in North East Chelmsford over the plan period
- Plan is premature as Labour propose 'grey belt' land which could be a better alternative to Hammonds Farm
- Re-distribute growth around planned new infrastructure i.e. North East Chelmsford and away from Hammonds Farm
- Concerns about 14a and 14b e.g., loss of agricultural land and flood risk
- Question classification of Ford End as a Service Settlement as it lacks services including a shop
- Opposition expressed to SGS2 and SGS3
- Consider growth east of Great Baddow, north of Writtle village, and land surrounding Galleywood and Danbury instead of proposed spatial strategy
- Large solar farms should be designated and shown as semi industrial on Local Plan diagrams.

### Strategic Policy 8 - Delivering Economic Growth

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy 8 - Delivering Economic Growth	8	1	22	22

Summary of Representations – main issues and suggested changes:

- Policy is broadly supported (Gladman, C J H Farming Ltd, Van Diemans Property Company, Wates Development and Hammonds Estates LLP)
- Bullet 1 should also refer to active modes of transport (Essex County Council)
- Add a new bullet supporting regional growth sector priorities and clustering of economic activity (Essex County Council)
- Add reference in para 6.58 to the need for an appropriate mix of uses to reflect market need (Essex County Council)
- Amend para 6.59 to remove the reference to South East Local Enterprise Partnership and include a reference to the Local Skills Improvement Plan (Essex County Council)
- Paragraph 6.62 should refer to the importance of the strategic sites and Garden Communities creating the agglomeration for economic development (Essex County Council)
- Reference ECC's Developers Guide to infrastructure contributions in the Reasoned Justification. Para 6.63 should reflect the need for Employment and Skills Plans to be agreed by the LPA and ECC ahead of agreeing S.106 Agreements (Essex County Council)
- Concerns expressed that the SGS15 scored lowest in average sustainable accessibility in the Transport Impact Appraisal (Chignal Parish Council)

- In accordance with the NPPF and PPG, the policy should be amended to reference the logistics sector (Greystoke CB)
- Additional smaller employment sites should be allocated to further diversify Chelmsford's economy (Hill Farm (Chelmsford) Ltd, Van Diemans Property Company)
- Add an additional bullet to refer to low carbon transport infrastructure (CNG Fuels Ltd)
- The South East Marine Plan policies such as SE-EMP-1 should be used as evidence to support the local plans policies (Marine Management Organisation).

### Strategic Policy S16 – Connectivity and Travel

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy 16 – Connectivity and Travel	14	2	26	26

Summary of Representations – main issues and suggested changes:

- Support for the policy (Essex County Council, Sport England, Wates Developments and Hammonds Estates LLP, Cliffords Group Ltd, Dandara / Dandara Eastern, Gladman Developments Ltd, Hill Residential, Dominus Chelmsford Ltd, CJH Farming Ltd, The Bucknell Family, Chris & Helen Copping, Pigeon (Sandon) Ltd, Daniel James Developments)
- Welcome further text relating to Bio/CNG and alternative fuels (CNG Fuels)
- Add a reference to how the policy can support the LCWIP routes through physical provision or financial contributions (Essex County Council)
- Include actions to remove barriers to travel for vulnerable users (Essex County Council)
- Encourage the plan to take account of the challenging targets for mode share and road safety as already in place in London (Transport for London)
- Walkable neighbourhood principles may not always be achievable, particularly for logistics development (Greystoke CB)
- Clarification sought on definition and thresholds for major and strategic development (ARU)
- Concerns about future traffic and impact on Great Baddow and the Baddow bypass
- There needs to be greater provision for disabled parking close to the shops in the City Centre, and better public transport
- Better public transport is needed particularly from Chelmer Village to Springfield and Beaulieu Park.

## Strategic Policy S9 – Infrastructure Requirements

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy 9 – Infrastructure Requirements	23	3	48	48

Summary of Representations – main issues and suggested changes:

- Support for the policy (Sport England, Environment Agency, Gladman, Anglian Water, Tritton Farming Partnership LLP, Dominus Chelmsford Limited, Whirledge and Nott, Croudace Homes, Vistry Group)
- The list of transport infrastructure measures should better reflect the correct user hierarchy prioritisation of sustainable modes (Wates Developments and Hammonds Estates LLP)
- The policy fails to specifically address the potential impacts of sites 16a and 16b on Danbury, combined with planned housing growth in Maldon, South Woodham Ferrers and Danbury, and the potential new power station. Modelling has already shown that mitigation is needed for Eves Corner and Well Lane junctions, without additional growth (Danbury Parish Council)
- Add active and sustainable travel to education and health facilities (Essex County Council)
- Separate Chelmsford North East Bypass and new Park and Ride sites bullets, refer to bypass phasing and future actions, and separate bus priority and inter-urban public transport bullets (Essex County Council)
- Update route-based strategies for the A414 and A132, including requirements for physical or financial contributions where development adds traffic (Essex County Council)
- Provide evidence to support the strategy for the A132, it is close to capacity and improvements may not deliver the required improvements
- Having worked with the City Council during the evolution of the proposed local plan and are generally content with the preferred options. There are some areas of concern that the A12 main line and the Chelmsford junctions (in particular junctions 16, 17, 18 and 19) will come under increasing pressure and congestion, delay and safety issues may arise. The exact impacts of the proposed growth are yet to be identified. Additional work is advised to be undertaken to gain a greater understanding of the impact the proposed development will have on the A12. Once known we will work with the council to develop an appropriate mitigation strategy (National Highways)
- Support principle of a sustainable bridge connection from Site 16a directly into Sandon Park and Ride but some qualifying text is needed (Wates Developments and Hammonds Estates LLP)
- There are opportunities to improve the National Cycle Network in the area, namely improvements to NCN1 and an additional route the junction 19 which would link to Beaulieu Station and North Chelmsford, as well as providing a link to the countryside for leisure cyclists and is a better alternative to the existing cycle route (Cycling UK)

- Would not support buses through the Park and Ride site, and would prefer a connection nearby (Essex County Council)
- The supporting text refers to new development creating demand for cycling, rail and road use only. The wording should be updated to include reference to walking and buses (Wates Developments and Hammonds Estates LLP)
- Clarify the supporting text to evidence the requirement and timing for the Chelmsford North East Bypass (CNEB) Phases 1b and 2. The requirement appears to be associated primarily with background increases in traffic using the A12, rather than trips from Hammonds Farm (Wates Developments and Hammonds Estates LLP).
- Support for the conclusion of the Transport Impact Appraisal of Preferred Spatial Approach (March 2024) that by maximising the potential for sustainable accessibility to and from the site along the A12 corridor, the impact on the strategic highway network should not be considered severe – rather than a requirement to ensure that background traffic flows along the A414 are not unreasonably delayed by the addition of development trips as stated elsewhere in the appraisal (Wates Developments and Hammonds Estates LLP)
- Include a reference to the Chelmer Waterside access bridge, to be consistent with Strategic Policy S17 (Essex County Council)
- The Army and Navy improvements are wider than the junction itself and include connecting routes (Essex County Council)
- Further assessment work is underway on some road locations, and we will work with the Council on appropriate mitigation if necessary (Highways England)
- Any new Park and Ride site for West Chelmsford should be outside the Green Belt (Writtle Parish Council)
- There is a need for joint working between South Essex authorities to improve sustainable travel connectivity north-south, particularly for access to jobs; and to address implications and opportunities arising from Thames Freeport (Castle Point Council)
- Changes to the strategic road network should be considered in the context of potential impacts on the wider network, including the A12 in London (Transport for London)
- Concerns about future traffic and impact on Great Baddow and the Baddow bypass
- Add provision of 5G mobile service to the utilities section (Essex County Council)
- Encourage opportunities to enhance and establish green infrastructure along sustainable transport and the Public Rights of Way networks (Essex County Council)
- Include a policy reference to incorporating urban greening (Natural England)
- Strengthen reference to the capacity of foul drainage and waste water treatment to address pollution prevention (Chelmsford & Central Essex RSPB Local Group)
- Add further text relating to low carbon refuelling facilities (CNG Fuels)



- Reword policy to be consistent with Policy DM16, and to clarify that bespoke mitigation measures, where appropriate, would be in addition to RAMS contributions (Natural England)
- Add references to the requirement for a range of developer funded police facilities to provide for effective community safety, cohesion and policing to create sustainable new communities (Essex Police)
- The Cathedral School is at full capacity and would need to expand to two form entry to meet demand, but a strategic approach is required to include independent schools in overall longer-term education planning and funding as part of a cohesive strategy (The Cathedral School)
- All the required infrastructure should be set out in each site policy to make it clearer what they are expected to provide (Dandara, Hill Residential Ltd) and clearly linked to proposed growth
- It is unclear how infrastructure will be delivered, implemented and funded (Higgins Group)
- Policy should address the need to mitigate impacts on primary, community, acute and ambulance service capacity (Mid and South Essex Integrated Care Board (ICB))
- Lack of hospital capacity, with sufficient car parking, and GP capacity is an issue
- If we cannot provide the infrastructure we should not build the houses and there should be legal requirements to ensure that schools, GPs, cycle routes, bus lanes are provided
- Evidence documents refer to uncertainty in forecasting forward beyond 2041 and therefore do not test more than 3,000 dwellings at East Chelmsford Garden Community (Hammonds Farm) (Wates Developments and Hammonds Estates LLP).

### Strategic Policy S10 – Securing Infrastructure and Impact Mitigation

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy 10 – Securing Infrastructure and Impact Mitigation	11	2	28	28

Summary of Representations – main issues and suggested changes:

- Supportive of the policy (Environment Agency, Anglian Water, Vistry Group, Chelmsford Garden Community Consortium, Essex County Council, NHS Property Services Ltd, Wates Developments and Hammonds Estates LLP)
- Include reference to ‘facilities’ within the policy and Reasoned Justification (Essex Police)
- Include reference to green and ‘blue’ infrastructure (Essex County Council)
- Amend ‘emergency services’ to ‘police, ambulance and fire & rescue facilities’ (Essex Police)

- Delete second policy paragraph as it should not be for a development, especially for one that has been allocated in the local plan, to subsequently demonstrate that there is sufficient capacity within local infrastructure to support that development (Home Builders Federation)
- Any reliance placed on planning obligations to fund infrastructure need to consider how much growth is being directed to locations that relate to such infrastructure, and whether such growth is sufficient to provide the requisite funding (Tritton Farming Partnership LLP)
- New housing sites necessitate developer funded police and healthcare facilities to be provided. Further changes are set out by Essex Police throughout the Plan (Essex Police, Mid and South Essex Integrated Care Board)
- Policies S9 and S10 should address the need to mitigate impacts on primary, community, acute and ambulance service capacity (Mid and South Essex Integrated Care Board)
- Greater clarity is sought within the evidence base with regards to specific details on the infrastructure being required for each site and how that will be secured. At present there is no link between Policy S9 and Policy S10 which should explain which infrastructure is relevant to which site and how delivery will be secured (Whirlledge & Nott, Croudace Homes)
- Include reference to the fact the IDP is a living document that will continue to be updated in the Reasoned Justification (Essex County Council)
- Supportive of the reference to ‘flood protection’ in the Reasoned Justification (Environment Agency).

### Strategic Policy S11 – The Role of the Countryside

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy 11 – The Role of the Countryside	8	4	29	29

Summary of Representations – main issues and suggested changes:

- Support policies which prevent development on the land between the A12 Bypass and the Green Belt, even if the Green Belt boundary changes (Essex Local Access Forum)
- Preserve agricultural land within the Green Belt between Chelmsford and south of the A12 as a breathing space for inhabitants
- Amend policy to align with Council’s response to the climate and ecological emergency to add significant material weight to developments that assist in delivering net zero emissions (CNG Fuels)
- Add more protection for the rural villages to prevent encroachment from larger settlements (Sandon Parish Council)

- Undertake a Green Wedge review (The Bucknell Family, Cliffords Group Ltd, Vistry Group, Obsidian Strategic Asset Management Ltd, Miscoe Enterprises Ltd and Hill Farm (Chelmsford) Ltd)
- Policy should be more flexible to allow sustainable development to come forward outside of defined built-up areas (Gladman Developments Ltd)
- Support principle of Green Wedges but no need for a specific Green Wedge Policy (Obsidian Strategic Asset Management Ltd)
- Support reference to Landscape Character Assessments, Historic Landscape Characterisation Study, Sensitivity and Capacity Assessments evidence base (Chignal Parish Council)
- Support policy (Writtle Parish Council)
- Question whether all areas of Green Belt serve the five key purposes as the context and role of these areas has evolved, particularly, land south of Chelmsford (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- A Green Belt Review should be undertaken (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Newell Properties Development Ltd, Hill Residential Ltd, Vistry Group, Higgins Group)
- Amend to refer to the Essex Green Infrastructure Strategy (2020) and the Essex Green Infrastructure Standards Technical Guidance, Essex Green Infrastructure Standards Non-Technical Guidance and the Local Nature Recovery Strategy (Essex County Council)
- Suggests policy wording in relation to rural economic development, with particular regard to existing businesses in rural locations, is clarified and more supportive of growth, expansion and diversification to avoid different interpretations at planning application stage (Strutt and Parker)
- Consider a small-scale alteration to the Green Wedge boundary and an extension to Widford Employment Area (Saxtons 4x4)
- Comments from landowners/developer suggesting alternative development sites are taken forward.

### Strategic Policy S12 – Role of City, Town and Neighbourhood Centres

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy S12 – Role of City, Town and Neighbourhood Centres	0	0	3	3

Summary of Representations – main issues and suggested changes:

- Support the distinction of centres with Chelmsford City Centre listed first (which is contrary to Policy S7) (Dominus Chelmsford Limited)
- Consider adding Hammonds Farm Neighbourhood Centre to the list of centres identified in para. 6.125 (Essex County Council)

- The policy lacks a reference to the benefits of/need for appropriate residential uses on upper floors in the city centre/designated centres (Dominus Chelmsford Limited/ Highgate Capital Limited).

### Strategic Policy S17 – Future of Chelmsford City Centre

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy S17 – Future of Chelmsford City Centre	6	1	9	9

Summary of Representations – main issues and suggested changes:

- Proposals for flood defences and flood management are welcome. The supporting text could include encouragement for developers to liaise with the Chelmsford Flood Resilience Partnership (The Environment Agency)
- Support for innovative and sustainable approaches, long-term resilience, nature-based solutions and natural flood management (Anglian Water Services Ltd)
- Support for policy approach, and specifically for The Meadows with some enhancements to text proposed (Dominus Chelmsford Limited)
- Amend text to refer to Park and Ride as part of bus connections (Essex County Council)
- Opportunity corridors supported – suggest amendment to reflect availability of planning tool for urban greening, and provide clarification of appropriate land uses (Essex County Council)
- The Meadows was only built in 1992 and does not need to be rebuilt, the proposal is unsustainable
- Proposals for The Meadows should include health facilities.

### Strategic Policy S13 – Monitoring and Review

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Policy S13 – Monitoring and Review	4	0	6	6

Summary of Representations – main issues and suggested changes:

- Support for policy (Richborough, Vistry Group, Higgins Group, Hill Residential Group, Gladman)
- Add a commitment for the future review to be completed and adopted within five years to ensure a rolling up-to-date Local Plan (Richborough)
- A full review is always necessary over a focussed review (Hill Residential Ltd).



## Where Will Development Growth be Focused?

This section of the consultation document provides the site policies for delivering the Spatial Strategy.

### Section 7 – Where Will Development Growth be Focused? (Paragraph 7.1 to 7.6)

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Section 7 - Where Will Development Growth be Focused? (Paragraph 7.1 to 7.6)	0	0	3	3

Summary of Representations – main issues and suggested changes:

- Recommend policy wording relating to the capacity of water recycling centres is included in all site allocation policies (Environment Agency)
- Suggest change to the name of this area to better reflect its location (Dominus Chelmsford Limited).

### Growth Area 1 – Central and Urban Chelmsford (paragraph 7.7-7.11 and Figure 16)

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Chelmsford Urban Area (paragraph 7.7 - 7.11 and Figure 16)	2	0	11	11

Summary of Representations – main issues and suggested changes:

- Support the approach to use brownfield land (Basildon Borough Council), the role of this area in the strategy (Gladman) and the opportunity for green/blue and natural infrastructure (Anglian Water Services Ltd)
- Suggest additional wording to ensure early discussions with developers (Anglian Water Services Ltd)
- Suggested wording changes to reflect education provision and delivery, and provision of bus services (Essex County Council)
- Additional site proposed for consideration for a co-living scheme (Highgate Capital Limited)
- Opposed to removal of car parks to allow for development
- Concern for the level of public service provision and securing promised infrastructure.

## Location 1 – Chelmsford Urban Area (paragraph 7.12)

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Chelmsford Urban Area (paragraph 7.12)	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Suggest wording changes to reflect opportunities for active and sustainable travel (Essex County Council).

## Strategic Growth Site Policy 1a - Chelmer Waterside

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site Policy 1a - Chelmer Waterside	4	0	9	9

Summary of Representations – main issues and suggested changes:

- Clarification sought on costs of any relocation and adequacy of width of waterside margin (Chelmsford Canoe Club)
- Suggest adding reference to police facilities (Essex Police)
- Early engagement will be required on sewer constraints (Anglian Water Services Ltd)
- Amend text to include a flood risk and management requirement and potential financial contributions (Environment Agency)
- Add reference to the role of multifunctional green infrastructure in water management (Essex County Council)
- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School)
- Additional site proposed for consideration in the allocation area, for co-living scheme (Highgate Capital Limited).

Strategic Growth Site Policy 1w – Meadows Shopping Centre and Meadows Surface Car Park

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site Policy 1w – Meadows Shopping Centre and Meadows Surface Car Park	1	3	14	14

Summary of Representations – main issues and suggested changes:

- Additional text suggested in relation to education contributions, parking, pedestrian and cycle routes (Essex County Council)
- A Heritage Impact Assessment should be undertaken before the next consultation stage (Historic England)
- Amend text to include a flood risk and management requirement and potential financial contributions (Environment Agency)
- Suggest adding reference to police facilities (Essex Police)
- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Consider on-site health care facilities to meet growing needs (Mid and South Essex Integrated Care Board)
- Support allocation but propose greater development density and a higher number of homes (Dominus Chelmsford Limited)
- Do not agree with building homes here, it is not a sustainable option to demolish it
- Opposed to the removal of car parks to allow for development, and active travel should feature
- Concerns expressed about loss of shops and jobs, the centre has good occupancy and could be revamped for shopping
- Proposals for The Meadows should include health and education facilities.

Strategic Growth Site Policy 1b – Former St Peter’s College, Fox Crescent

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site Policy 1b – Former St Peter’s College, Fox Crescent	1	0	9	9



Summary of Representations – main issues and suggested changes:

- Support for the policy requirement to provide or make financial contributions to sport, leisure and recreation facilities, and for commuted sums in lieu of loss of open space (Sport England)
- Add reference to police facilities (Essex Police)
- Add reference to specialised supported housing (Essex County Council)
- Change wording relating to how special schools are referred to (Essex County Council)
- Add additional text in relation to green infrastructure and nature recovery networks (Essex County Council).

Strategic Growth Site Policy 1x – Former Kay Metzeler Premises, Brook Street

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site Policy 1x – Former Kay Metzeler Premises, Brook Street	2	0	7	7

Summary of Representations – main issues and suggested changes:

- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School)
- A Heritage Impact Assessment should be undertaken before the next consultation stage (Historic England)
- Add a reference to police facilities (Essex Police)
- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Add additional text in relation to green infrastructure and nature recovery networks (Essex County Council).

Strategic Growth Site Policy 1d – Riverside Ice and Leisure Land, Victoria Road

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site Policy 1d – Riverside Ice and Leisure Land, Victoria Road	2	0	11	11

Summary of Representations – main issues and suggested changes:

- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School)

- Amend text to include flood risk and management requirement and potential financial contributions (Environment Agency)
- Suggest adding reference to police facilities (Essex Police)
- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Add additional text in relation to pedestrian and cycle links, and active and sustainable travel (Essex County Council)
- Opposed to the removal of car parks to allow for development.

Strategic Growth Site Policy 1e – Civic Centre Land, Fairfield Road

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site Policy 1e – Civic Centre Land, Fairfield Road	0	0	5	5

Summary of Representations – main issues and suggested changes:

- Add reference to police facilities (Essex Police)
- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Add additional text in relation to active and sustainable travel, and Chelmsford Transport Interchange Project (Essex County Council)
- Opposed to the removal of car parks to allow for development.

Strategic Growth Site Policy 1f – Eastwood House Car Park, Glebe Road

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site Policy 1f – Eastwood House Car Park, Glebe Road	0	0	5	5

Summary of Representations – main issues and suggested changes:

- Add additional text in relation to green infrastructure and nature recovery networks (Essex County Council)
- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Add reference to police facilities (Essex Police)
- Opposed to the removal of car parks to allow for development.

Strategic Growth Site Policy 1y – Land Between Hoffmanns Way and Brook Street (Marriages Mill)

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site Policy 1y – Land Between Hoffmanns Way and Brook Street (Marriages Mill)	2	0	5	5

Summary of Representations – main issues and suggested changes:

- Add additional text in relation to green infrastructure and nature recovery networks (Essex County Council)
- Add reference to police facilities (Essex Police)
- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School).

Policy GR1 – Growth Sites in Chelmsford City Centre/Urban Area

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Policy GR1 – Growth sites in Chelmsford City Centre/Urban Area	2	0	10	10

Summary of Representations – main issues and suggested changes:

- Support for requirements to make contributions towards new/enhanced sport, leisure and recreation facilities (Sport England)
- Add additional text in relation to active and sustainable travel, and additional bullet for sites to enhance existing pedestrian and cycle routes (Essex County Council)
- Add additional text in relation to green infrastructure and nature recovery networks (Essex County Council)
- Sustainable drainage systems should be a consideration on all proposed development sites, and aligned with green and blue infrastructure provision wherever possible (Anglian Water Services Ltd)
- Add reference to police facilities (Essex Police)
- Concerned about traffic generation in the City Centre, public transport, sustainable travel and car clubs should be considered
- Other sites could also be considered such as Andrews Place (Chelmer Housing Partnership).

Growth Site Policy 1g – Chelmsford Social Club, Springfield Road

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1g – Chelmsford Social Club, Springfield Road	0	0	0	0

No comments.

Growth Site Policy 1h – Ashby House Car Parks, New Street

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1h – Ashby House Car Parks, New Street	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Opposed to the removal of car parks to allow for development.

Growth Site Policy 1i – Rectory Lane Car Park West

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1i – Rectory Lane Car Park West	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Opposed to the removal of car parks to allow for development.

Growth Site Policy 1z – Granary Car Park, Victoria Road

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1z – Granary Car park, Victoria Road	2	3	8	8

Summary of Representations – main issues and suggested changes:

- A Heritage Impact Assessment should be undertaken due to proximity to Grade II listed Springfield Water Mill (Historic England)
- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School)
- Scale of development should be much more modest due to its location, such as a small terrace to mirror existing nearby houses
- Retain site as City open space; this natural open space should be protected
- Concerns about increased strain on local infrastructure including education
- Previous proposals have not been financially viable
- Opposed to the removal of car parks to allow for development; it is a very important and convenient car park for the nearby hotel, sports events, shopping.

Growth Site Policy 1k – Former Chelmsford Electrical and Car Wash, Brook Street

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1k – Former Chelmsford Electrical and Car Wash, Brook Street	0	0	0	0

No comments.

Growth Site Policy 1aa – Coval Lane Car Park

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1aa – Coval Lane Car Park	0	1	4	4

Summary of Representations – main issues and suggested changes:

- Scale of development should be much more modest to be in keeping with surrounding development
- Concerns about increased traffic from new development
- Development should be conditional on provision of a further Park and Ride site at Widford
- Opposed to the removal of car parks to allow for development; loss of parking may impact on West End businesses; there is not enough on-street parking to accommodate the local residents' needs
- Cumulative effect of other nearby development should be considered including office to housing conversions at Paragon House.

Growth Site Policy 1l – BT Telephone Exchange, Cottage Place

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1l – BT Telephone Exchange, Cottage Place	0	0	0	0

No comments.

Growth Site Policy 1m – Rectory Lane Car Park East

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1m – Rectory Lane Car Park East	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Opposed to the removal of car parks to allow for development.

Growth Site Policy 1n – Waterhouse Lane Depot and Nursery

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1n – Waterhouse Lane Depot and Nursery	0	0	0	0

No comments.

Growth Site Policy 1o – Church Hall Site, Woodhall Road

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1o – Chelmsford Social Club, Church Hall Site, Woodhall Road	0	0	0	0

No comments.

Growth Site Policy 1p – British Legion, New London Road

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1p – British Legion, New London Road	0	0	0	0

No comments.

Growth Site Policy 1q – Land rear of 17-37 Beach's Drive

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1q – Land rear of 17-37 Beach's Drive	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Add reference to safe and convenient pedestrian and cycle access (Essex County Council).

Growth Site Policy 1r – Garage Site, St Nazaire Road

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1r – Garage Site, St Nazaire Road	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Add reference to providing a safe and convenient pedestrian link (Essex County Council).

Growth Site Policy 1bb – Glebe Road Car Park

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1bb – Glebe Road Car Park	0	1	3	3

Summary of Representations – main issues and suggested changes:

- A Heritage Impact Assessment should be undertaken due to location in the West End Conservation Area (Historic England)
- Opposed to the removal of car parks to allow for development; this is the only overnight car park; there is already not enough parking for local residents
- Concern that overlooking and noise will be an issue.

Growth Site Policy 1s – Garage Site and Land, Medway Close

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1s – Garage Site and Land, Medway Close	0	0	0	0

No comments.

Growth Site Policy 1t – Car Park r/o Bellamy Court, Broomfield Road

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1t –Car Park r/o Bellamy Court, Broomfield Road	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Opposed to the removal of car parks to allow for development.

Growth Site Policy 1u – Rivermead, Bishop Hall Lane

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1u – Rivermead, Bishop Hall Lane	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Add reference to provision of new bridges for safe and convenient connections to the pedestrian and cycle network (Essex County Council).



## Growth Site Policy 1v – Railway Sidings, Brook Street

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 1v – Railway Sidings, Brook Street	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Add reference to provision of safe and convenient pedestrian and cycle routes (Essex County Council).

## Location 2 – West Chelmsford

### Strategic Growth Site Policy 2 – West Chelmsford

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site Policy 2 – West Chelmsford	3	2	20	20

Summary of Representations – main issues and suggested changes:

- Add reference to ‘multifunctional’ green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Minor policy change suggested to reflect the provision of a primary school and early years nursery (Essex County Council)
- Add reference to active and sustainable modes of transport, where alternatives to the private car are prioritised, and financial contributions towards bus services (Essex County Council)
- Provide safe and convenient pedestrian and cycle connections, links to the urban area and accessibility for bus services (Essex County Council)
- Provide a safe traffic free environment around school pedestrian entrances having regard to the requirements set out in ECC’s Developers’ Guide to Infrastructure Contributions (Essex County Council)
- Support for requirements to make contributions towards new/enhanced sport, leisure and recreation facilities, and inclusion of these facilities in the masterplan (Sport England)
- Add reference to police facilities (Essex Police)
- Concerns of the impact from development on local services such as Writtle GP surgery (Good Easter Parish Council)
- Unclear what healthcare provision is envisaged as part of the proposed neighbourhood centre; a new GP surgery could be provided here (Good Easter Parish Council)

- Concerns about the potential traffic impact on Roxwell Road/A1060, a proportion of the traffic should be able to use Chignall Road via Trent Road/Avon Road (Good Easter Parish Council)
- The proposed multi-user crossing will cause further congestion, although its purpose and intended users is not clear (Good Easter Parish Council)
- Buses will be delayed by traffic queues without space to provide a bus lane
- The commitment to CIL funding is welcome, and assurance is sought that this will not change in future (Writtle Parish Council).

### Location 3 – East Chelmsford

#### Strategic Growth Site Policy 3a – East of Chelmsford, Manor Farm

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site Policy 3a – East of Chelmsford, Manor Farm	2	1	16	16

Summary of Representations – main issues and suggested changes:

- Support policy requirements including for development to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities (Sport England)
- Add to policy requirements for a foul drainage strategy and SuDs as part of a multi-functional green and blue infrastructure delivery framework should an alternative development strategy be taken forward for this site (Anglian Water Services Ltd)
- Support the allocation ((Hopkins Homes Ltd)
- Para. 7.135 – The site has no existing or planned access for horse riders and any proposals could conflict with the residential area and country park users (Hopkins Homes Ltd)
- Do not support Para. 7.141 - Requirement for a Minerals Resource Assessment is inconsistent with Policy S8 of the Minerals Local Plan which exempts land already allocated in adopted plans (Hopkins Homes Ltd)
- Ensure any need for minerals extraction is factored into the housing trajectory to allow for the potential delays to delivery (Hopkins Homes Ltd)
- In absence of any justification, with reference to the CIL Regulations, delete the requirement to fund the creation of a visitors' centre at Sandford Mill (Hopkins Homes Ltd)
- Requirements for financial contributions for education, community and healthcare, sports, leisure and recreation duplicate S9 and S10. If retained in the policy, amend to state that contributions will be “appropriate and proportionate” (Hopkins Homes Ltd)

- A new plan policy is required to address the cumulative recreational pressure on Blakes Wood and Lingwood Common SSSI, Woodham Walter Common SSSI, Danbury Common SSSI and other wildlife sites from increased levels of recreational pressure arising from the new residents at Growth Sites 16a, 3a and 13 (Natural England)
- Add to SGS3a and d policies that active travel connections should be to existing and proposed development areas within East of Chelmsford and at East Chelmsford Garden Community (Wates Developments and Hammonds Estates LLP)
- Expand SGS3a and d to require appropriate measures to enable public transport access to and from the site, and to ensure public transport strategy proposals integrate with existing and proposed development areas within East Chelmsford and at the East Chelmsford Garden Community (Wates Developments and Hammonds Estates LLP)
- Amend Historic and Natural Environment, bullet 4 to refer to 'multifunctional green infrastructure (Essex County Council)
- Amend Movement and Access bullet to refer to 'safe and convenient' pedestrian and cycle connections (Essex County Council)
- Amend Site infrastructure requirements bullet 7 to 'Provision of a new northwest safe and convenient pedestrian/cycle link through the Country Park to provide a connection to future off-site cycle links.' (Essex County Council)
- For consistency with other parts of the plan refer to 'active and sustainable travel' in para. 1 of the policy (Essex County Council)
- Object to site for multiple reasons including potential contamination of land, flood risk, housing density and positioning, education and medical care, biodiversity and traffic impacts (Great Baddow Parish Council)
- Under 'Site infrastructure requirements' expand bullet point 10 to refer to police facilities as required by Essex Police (Essex Police)
- Support proposal to improve the cycle crossing of the River Chelmer at Sandon Mill (Cycling UK)
- Include requirement for a more direct cycle route to the city centre which follows Essex Yeomanry Way to the Army and Navy (Cycling UK)
- It appears that the extension to Sandon Park and Ride is now intended to serve Hammonds Farm development
- The SGS3a masterplan should consider pollution sampling from the former nearby landfill site and the nuclear bunker
- The Local Plan is undermined by speculative applications such as the proposed warehouse development at Sandon
- There aren't enough trained professionals to staff the new infrastructure needed e.g. schools
- Unsustainable to build new homes close to the flood plain adjacent to the Army & Navy
- Proposed new developments will increase flooding potential.

Strategic Growth Site Policy 3b – East of Chelmsford, Land North of Maldon Road (Employment)

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site Policy 3b – East of Chelmsford, Land North of Maldon Road (Employment)	0	0	10	10

Summary of Representations – main issues and suggested changes:

- Expand policy to require the development to prepare a strategy for responding to the National Grid Electricity Transmission plc (NGET) overhead transmission lines within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design (National Grid Electricity Transmission)
- Under ‘Site infrastructure requirements’ expand bullet point 5 to refer to police facilities as required by Essex Police (Essex Police)
- Replace Site Infrastructure Requirements, bullet 1 with ‘New 56 place stand-alone early years and childcare nursery (Use Class E(f)) on 0.13 hectares of suitable land allocated for education and childcare use (Essex County Council)
- Support allocation (Redrow Homes & Speakman Family)
- Amend Movement and Access bullet 3 to refer to ‘safe and convenient’ pedestrian and cycle connections (Essex County Council)
- Amend para. 7.151 to refer to ‘safe and convenient cycle/footway’ (Essex County Council)
- Amend Historic and Natural Environment, bullet 3 to refer to ‘multifunctional’ green infrastructure (Essex County Council).

Strategic Growth Site Policy 3c – East of Chelmsford, Land South of Maldon Road

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site Policy 3c – East of Chelmsford, Land South of Maldon Road	0	0	5	5

Summary of Representations – main issues and suggested changes:

- Amend Movement and Access bullet 3 to refer to ‘safe and convenient’ pedestrian and cycle connections (Essex County Council)

- Given that SGS3c and d are at planning application stage, the policy should not include additional infrastructure requirements e.g., a Pegasus crossing unless some flexibility is given (Redrow Homes & Speakman Family)
- Support allocation, but expand the site allocation (Redrow Homes & Speakman Family)
- Object to site for multiple reasons including potential contamination of land, flood risk, housing density and positioning, education and medical care, biodiversity and traffic impacts (Great Baddow Parish Council).

Strategic Growth Site Policy 3d – East of Chelmsford, North of Maldon Road

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Growth Site Policy 3d – East of Chelmsford, North of Maldon Road	0	0	6	6

Summary of Representations – main issues and suggested changes:

- Amend Movement and Access bullet 3 to refer to ‘safe and convenient’ pedestrian and cycle connections (Essex County Council)
- Amend para. 7.176 to read 'A safe and convenient cycle/footway should connect the site to Sandon Park and Ride to the east to maximise use of the existing Park and Ride site (Essex County Council)
- Amend Historic and Natural Environment, bullet 3 to refer to ‘multifunctional’ green infrastructure (Essex County Council)
- Support allocation but given that SGS3c and d are at planning application stage, the policy should not include additional infrastructure requirements e.g., a Pegasus crossing unless some flexibility is given (Redrow Homes & Speakman Family).

Location 4 – Growth Site Policy 4 – Land North of Galleywood Reservoir

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 4 – Land North of Galleywood Reservoir	0	0	4	4

Summary of Representations – main issues and suggested changes:

- For consistency with other parts of the plan, strengthen references to active travel in policy and para 7.190 (Essex County Council)
- Policy text should require multifunctional green infrastructure (Essex County Council).

- The viability and deliverability of this site is questioned as it has been allocated for over four years (Park View Group).

Location 5 – Growth Site Policy 5 – Land Surrounding Telephone Exchange, Ongar Road, Writtle

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 5 – Land Surrounding Telephone Exchange, Ongar Road, Writtle	1	0	4	4

Summary of Representations – main issues and suggested changes:

- Support allocation. The site is expected to be surplus to operational requirements (as a telephone exchange) by 2031. Adjust boundary to fully reflect our land ownership and ensure deliverability (Telereal Securitised Property GP Limited)
- Use a minimum or indicative capacity of 25 to enable a future planning application to determine the exact quantum, layout, form, mix and tenure of new homes (Telereal Securitised Property GP Limited)
- Amend policy to enable a future planning application to be informed by an arboricultural impact assessment with regards to the potential retention of trees on site (Telereal Securitised Property GP Limited)
- Policy text in relation to infrastructure requirements should be modified to be appropriate and proportionate (Telereal Securitised Property GP Limited)
- For consistency with other policies, amend to strengthen references to active travel (Essex County Council)
- Split bullet 1 under Site Development Principles into two for consistency with other site policies (Essex County Council)
- Policy text should require multifunctional green infrastructure (Essex County Council).

Growth Area 2 – North Chelmsford (paragraphs 7.200-7.205 and Figure 17)

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Area 2 – North Chelmsford (paragraphs 7.200-7.205 and Figure 17)	2	1	9	9

Summary of Representations – main issues and suggested changes:

- Support for the importance of North East Chelmsford and Chelmsford Garden Community in delivering significant levels of growth (Cliffords Group Ltd, Daniel James Developments)
- Support for inclusion of Little Boyton Hall (C J H Farming Ltd)
- Excluding development at Boreham is a missed opportunity (Gladman)
- There is currently no right of way through the Green Wedge from Broomfield, so reference to this should be removed (Broomfield Parish Council).

Location 6 – North East Chelmsford (Chelmsford Garden Community)

Strategic Growth Site Policy 6 – North East Chelmsford (Chelmsford Garden Community)

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site 6 – North East Chelmsford Garden Community	7	0	31	31

Summary of Representations – main issues and suggested changes:

- Support for the policy (Cliffords Group Ltd, Hallam Land Management)
- Support the policy subject to detailed proposed amendments to wording including replacing 20% biodiversity with 10%, and replacing a new Country Park with three new destination parks and (Vistry Group, Chelmsford Garden Community Consortium)
- Support for measures to encourage physical activity and new or enhanced sport, leisure and recreation facilities (Sport England)
- Support for the inclusion of a country park and green infrastructure, and 20% BNG (Natural England)
- An assessment of what is being provided as suitable alternative natural greenspace is needed (Natural England)
- The distinction between public green spaces and wildlife habitats could be made, with greater focus on integrating biodiversity rather than segregation; planting and biodiversity features should use native species; and would like riparian corridors to maintain a buffer zone for public space rather than private gardens (Environment Agency)
- Ensure that sufficient flood risk measures are incorporated and, where possible, as part of multi-functional green and blue infrastructure; and nature based solutions to provide environmental gains, rather than carbon intensive 'grey infrastructure' mitigation (Anglian Water Services Ltd)
- Refer to 'multifunctional' green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Make a reference to active and sustainable travel (Essex County Council)

- Strengthen the supporting text to reference the importance of the innovation park, the critical success factors needed, skills and the employment mix (Essex County Council)
- Clarify the wording relating to the quantity and type of education provision (Essex County Council)
- Provide a safe traffic free environment around school pedestrian entrances having regard to the requirements set out in ECC’s Developers’ Guide to Infrastructure Contributions (Essex County Council)
- Policy should require renewable and low carbon energy schemes, rather than just encourage them
- Stewardship principles are supported. Add additional bullets requiring stewardship activities to be in place for the first housing occupations and for an Asset Schedule of ownership and responsibility for community assets to be prepared (Essex County Council)
- Add to the end of para. 7.216 “Appropriate funding will also need to be made for police facilities to provide for community safety, cohesion and policing as required by Essex Police.” (Essex Police)
- Ten Gypsy and Traveller plots have already been provided through the adopted Local Plan; there is now sufficient provision within this community, and it would be desirable to consider locations elsewhere (Chelmsford Garden Community Council)
- Additional land proposed at Domsey Lane, Cranham Road, and Wheelers Hill (Daniel James Developments, Hallam Land Management).

Location 7 – Great Leighs

Strategic Growth Site Policy 7a – Great Leighs – Land at Moulsham Hall

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site 7a – Great Leighs – Land at Moulsham Hall	2	3	19	19

Summary of Representations – main issues and suggested changes:

- Support for the policy (Environment Agency)
- Policy requirement to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities is welcomed (Sport England)
- Policy change suggested to reflect Essex Police (Essex Police)
- Make reference to ‘multifunctional’ green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Policy change suggested to clarify wording for the primary school provision and childcare facilities (Essex County Council)
- Provide additional safe and convenient pedestrian and cycle connections to Great Leighs village, and ensure good accessibility for buses (Essex County Council)
- Add a reference to active and sustainable travel (Essex County Council)



- Provide a safe traffic free environment around school pedestrian entrances having regard to the requirements set out in ECC's Developers' Guide to Infrastructure Contributions (Essex County Council)
- There are woodlands on or in proximity to several allocations including those at Great Leighs, including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with paragraph 186 (c) of the NPPF. Council is also referred to information in Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- Phasing conditions may be needed to align development with Anglian Water's investment plans (Environment Agency)
- The policy does not mention the site location is within the RAMS zone of influence, meaning that an assessment of suitable alternative natural greenspace may be needed (Natural England)
- Clarify wording in relation to the capacity of Great Leighs Water Recycling Centre (Anglian Water)
- Further land is promoted adjacent to the site (Harris Strategic Land Ltd)
- The policy should include a clear requirement for buffer habitat to protect the Essex Wildlife Trust Phyllis Currie Nature Reserve and a financial contribution towards mitigating increased recreational impacts (Essex Wildlife Trust).

#### Strategic Growth Site Policy 7b – Great Leighs – Land East of London Road

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site 7b – Great Leighs – Land East of London Road	0	0	12	12

#### Summary of Representations – main issues and suggested changes:

- Add a reference to active and sustainable travel, and that bus enhancements should be funded by the developer (Essex County Council)
- Provide additional safe and convenient pedestrian and cycle connections to Great Leighs village, especially for older persons (Essex County Council)
- Add reference to 'multifunctional' green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Seek clarification on the affordable housing and specialist residential accommodation mix (Essex County Council)
- Policy changes suggested to reflect Essex Police (Essex Police)
- There are woodlands on or in proximity to several allocations including those at Great Leighs, including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with paragraph 186 (c) of the NPPF. Council is also referred to information in Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- Phasing conditions may be needed to align development with Anglian Water's investment plans (Environment Agency)

- Clarify wording in relation to the capacity of Great Leighs water recycling centre (Anglian Water)
- The policy does not mention the site location is within the RAMS zone of influence, meaning that an assessment of suitable alternative natural greenspace may be needed (Natural England).

Strategic Growth Site Policy 7c – Great Leighs – Land North and South of Banters Lane

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site 7c – Great Leighs – Land North and South of Banters Lane	0	1	13	13

Summary of Representations – main issues and suggested changes:

- Support for the allocation (Landvest and Harding Homes)
- Add a reference to active and sustainable travel, and that bus enhancements should be funded by the developer (Essex County Council)
- Provide additional safe and convenient pedestrian and cycle connections to Great Leighs village, especially for older persons (Essex County Council)
- Add a reference to ‘multifunctional’ green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Policy change suggested to reflect Essex Police (Essex Police)
- There are woodlands on or in proximity to several allocations including those at Great Leighs, including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with paragraph 186 (c) of the NPPF. Council is also referred to information in Natural England and Forestry Commission’s Standing Advice on Ancient Woodland (Forestry Commission England)
- Clarify wording in relation to the capacity of Great Leighs Water Recycling Centre (Anglian Water)
- Phasing conditions may be needed to align development with Anglian Water’s investment plans (Environment Agency)
- The policy does not mention the site location is within the RAMS zone of influence, meaning that an assessment of suitable alternative natural greenspace may be needed (Natural England).

Location 8 – Strategic Growth Site Policy 8 – North of Broomfield

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Location 8 – Strategic Growth Site Policy 8 – North of Broomfield	7	0	33	33

## Summary of Representations – main issues and suggested changes:

- Requirement to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities and providing a coherent network of public open space, formal and informal sport, recreation and community space within the site is welcomed (Sport England)
- Address the missing link between Goulton Road and the start of the segregated cycle tracks on Broomfield Road as the current situation is a major barrier to active travel between the site and the city centre (Cycling UK)
- Need more religious facilities/community spaces including for Muslim population in North Chelmsford (Essex Muslim Centre)
- Policy change suggested to add ‘and police facilities as required by Essex Police’ (Essex Police)
- Refer to a robust traffic strategy for the local road network, in lieu of the hospital access road and to add flexibility about how the new health care facility could be achieved (Broomfield Parish Council)
- For consistency with other parts of the plan, strengthen references to active travel and refer to ‘safe and convenient’ pedestrian and cycle connections (Essex County Council)
- Amend to reflect ECC’s preferred wording for ‘new 56 place stand-alone early years and childcare nursery (Use Class E(f)) on 0.13 hectares of suitable land allocated for education and childcare use’, and refer to ‘nursery’ rather than ‘nursery school’ in supporting text (Essex County Council)
- Refer to ‘multifunctional’ green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Add individual bullets requiring financial contributions to the North East Bypass and education (Essex County Council)
- Amend reference to ‘good accessibility for buses’ rather than ‘bus priority measures’ (Essex County Council)
- Some allocations have woodland on/near to the site including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Proposals should reduce any impact on irreplaceable habitat. Decisions should reference Natural England and Forestry Commission’s Standing Advice on Ancient Woodland – plus supporting Assessment Guide and “Keepers of Time” – Ancient and Native Woodland and Trees Policy in England (Forestry Commission England).

### Location 9 – Growth Site Policy 9a – Waltham Road Employment Area

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Location 9 – Growth Site Policy 9a – Waltham Road Employment Area	1	11	16	16

Summary of Representations – main issues and suggested changes:

- Support for the allocation which is in a suitable location and complimentary to the existing provision with no known constraints (LVJ Maldon Limited)
- The use of ‘around’ 3,500sqm is supported but flexibility is needed so that further land can be included to meet employment needs. Boundary should be enlarged to include land to the north (LVJ Maldon Limited)
- Designated heritage assets in and outside the Boreham Roman Road/Plantation Road Conservation Area are unlikely to be impacted (Historic England)
- For consistency with other parts of the plan, strengthen references to active travel in the policy (Essex County Council)
- The existing employment area is a bad example of town planning, an eyesore with larger industrial type operations and in an inappropriate location for employment space, and this proposal would make it worse (Boreham Conservation Society)
- Any additional highway works would adversely infringe on the rural setting of this country road
- Concern over the loss of prime agricultural land, increased flood risk and that the site lacks mains utilities (Boreham Conservation Society)
- Concerns it would generate additional traffic movements through Boreham (already approaching capacity) on top of those already proposed due to the A12 widening scheme (Boreham Conservation Society)
- Existing cycle and walkways are poorly maintained (Boreham Conservation Society)
- The size boundary appears much larger than necessary so could lead to uncontrolled development
- The proposal contradicts ECC’s Boreham Traffic Mitigation Scheme
- The planned solar farm development and train station would generate additional traffic movements on top of those from this site
- The proposal would ruin the countryside adjacent to a local wildlife site
- Would lead to increased pollution, the existing employment area is already a nuisance to neighbours
- The existing employment area does not benefit the local community as occupiers are mainly large operators and all employees must travel by car.

Location 14 – Ford End

Growth Site 14a – Land West of Back Lane, Ford End

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site 14a – Land West of Back Lane, Ford End	1	17	20	20

Summary of Representations – main issues and suggested changes:

- Ford End is within Great Leighs Water Recycling Centre catchment area which has some capacity to accommodate flows from small scale growth. There are no Anglian Water assets within the indicated areas for growth at Ford End (Anglian Water)
- A Heritage Impact Assessment (HIA) would be beneficial to identify any necessary mitigation and enhancement measures. Amend policy is require a Heritage Impact Assessment with a planning application (Historic England)
- Object to the allocation. Concerns include access, flooding, heritage impacts and neighbour amenity (Great Waltham Parish Council)
- Policy changes suggested relating to education provision (Essex County Council)
- Support the allocation expressed
- Concerns expressed relating to loss of Grade 2 agricultural land, impacts on heritage assets, flood risk, limited pedestrian and cycle connections to the site and, noise, air and light pollution
- Proposal will increase traffic and congestion, previous requests for road calming measures were rejected by Essex Highways
- Lack of existing infrastructure to support the development including a suitable road network, local shops, school and utility capacity and public transport
- Unsuitable/unsafe access and egress to the site, including roads being too narrow for vehicles and pedestrians
- Concerns over impacts on settlement character and countryside
- The development will not contribute to the local economy
- There more suitable sites within the vicinity as set out in the SHELAA
- Impact on neighbour amenity owing to (amongst other matters) the ground levels being higher at the allocation site.

Growth Site 14b – Land South of Ford End Primary School

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site 14b – Land South of Ford End Primary School	2	18	24	24

Summary of Representations – main issues and suggested changes:

- Support but allocate the whole site (5.37ha) for around 50 homes. This would deliver substantial benefits (Dandara Eastern)
- Support and consider a greater quantum on a single site rather than Growth Site 14a (Great Waltham Parish Council)

- Development should include appropriate access arrangements, traffic management, and mitigation and contributions towards education (Great Waltham Parish Council)
- Development would not affect any designated heritage assets (Historic England)
- Ford End is within Great Leighs Water Recycling Centre catchment area which has some capacity to accommodate flows from small scale growth. There are no Anglian Water assets within the indicated areas for growth at Ford End (Anglian Water).
- Policy changes suggested relating to education provision (Essex County Council)
- Support expressed for site
- Concerns expressed relating to loss of Grade 2 agricultural land, impacts on heritage assets, flood risk and drainage, limited pedestrian and cycle connections to the site and, noise, air and light pollution
- Proposal will increase traffic and congestion, previous requests for road calming measures were rejected by Essex Highways
- Lack of existing infrastructure to support the development including a suitable road network, local shops, school and utility capacity and public transport
- Unsuitable/unsafe access and egress to the site, including roads being too narrow for vehicles and pedestrians
- Concerns over impacts on settlement character and countryside
- The development will not contribute to the local economy
- There more suitable sites within the vicinity as set out in the SHELAA
- Impact on neighbour amenity owing to (amongst other matters) the ground levels being higher at the allocation site.
- The development will conflict with the school's current access arrangements, impacting on the safety of children
- Concerns that houses will overlook the school and impact on the safety of children.

#### Location 15 – Little Boyton Hall Farm Employment Area

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Location 15 – Little Boyton Hall Farm Employment Area	2	1	8	8

Summary of Representations – main issues and suggested changes:

- Existing and prospective tenants support the proposal. They respect for example, the location, provision of parking and landscaping (Christopher Philpot)

- Support but amend policy to optimise flexibility and deliverability of the site for example by removing the need for a masterplan or changing the timing of when it is required (CJH Farming Ltd)
- Expand the range of uses that can come forward provide a flexible site capacity, and expand the allocation boundary (CJH Farming Ltd)
- Grade II listed Little Boyton Hall is adjacent to the site but impacts are considered unlikely. Amend policy text to ensure it is protected (Historic England)
- Add additional text in relation to green infrastructure (Essex County Council)
- For consistency with other parts of the plan, strengthen references to active travel (Essex County Council)
- Concerns expressed including loss of agricultural land, site is unsustainable, will be harmful to the landscape and adversely impact on views from the north which is largely ignored by the consultant (Chignal Parish Council)
- The site is near an Ancient Woodland. Consider direct and indirect effects of development during the construction and operational phases (Forestry Commission England)
- The site is very tranquil, is poorly served by public transport and difficult to cycle to, hence most users will drive
- Whilst the site is intended to be served from the A1060, occupiers might access from Chignal/Mashbury/High Easter where the lanes are in a very poor condition.

Growth Area 3 – South and East Chelmsford (paragraphs 7.340-7.348 and Figure 18)

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Area 3 – South and East Chelmsford (Paragraphs 7.340-7.349 and Figure 18)	2	5	10	10

Summary of Representations – main issues and suggested changes:

- Support expressed (Pigeon (Sandon) Ltd, Cycling UK)
- In para. 7.341 add reference to ‘multifunctional’ green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Reword ‘Site infrastructure requirements’ sections in revised site policies to simply refer to school land requirements i.e. ‘A new primary school (Use Class F1(a)) with co-located early years and childcare nursery (Use Class E(f)) on 2.1 hectares of suitable land allocated for education and childcare use’ (Essex County Council)
- Expand para. 7.343 to refer to ‘new’ bus services as well as enhanced (Essex County Council)
- Amend para 7.345 to reflect that only Location 10 will provide improvements to the A132/B1012 Rettendon Turnpike Junction as development at Danbury

and Bicknacre will only provide site access and local walking and cycling improvements as appropriate (Essex County Council)

- Require financial contributions for provision of new and/or enhanced bus services in the 'Movement and Access / Site Infrastructure Requirements' sections of site policies (Essex County Council)
- Do not support. Need a Green Belt Review to identify a more sustainable distribution of new housing including within/around Key Service Settlements in the Green Belt (Whirlledge & Nott, Croudace Homes)
- Various comments from landowners/developers promoting their proposed development sites including within the Green Belt.

Main issues raised in relation to locations in Growth Area 3 appear under the specific sites e.g. SGS16a.

#### Location 16 – East Chelmsford

#### Strategic Growth Site 16a – East Chelmsford Garden Community (Hammonds Farm)

Key statistics:

<u>Consultation point</u>	<u>Yes</u>	<u>No</u>	<u>Comments</u>	<u>Total number of responses</u>
Strategic Growth Site 16a – East Chelmsford Garden Community (Hammonds Farm)	9	4410	4433	4448

It should be noted that in some cases, members of the public raised similar points to stakeholders listed in brackets. This is especially the case in relation to comments made by Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group to this Strategic Growth Site which have been replicated and amplified by many individuals. To avoid duplication, these comments have not been repeated in the public comments.

Summary of Representations – main issues and suggested changes:

- Supportive of Garden Communities and that they follow TCPA Garden City Principles, and recommend that East Chelmsford is progressed having regard to the key principles set out in the Essex Design Guide - Garden Communities (Essex County Council)
- Fully support the numbers and types of homes/employment proposed in the site allocation (Wates Developments and Hammonds Estates LLP)
- Support the introduction of new employment uses in the area that will help strengthen Chelmsford's economy (CNG Fuels)
- The delivery of Site 16b is conditional upon the masterplan of Site 16a, and consequently the expectation of delivery by 2030 maybe unrealistic (Greystoke CB)



- Identify in the policy that the Garden Community has potential to support an innovative and bespoke housing mix to assist in optimising delivery, and achieving Garden City Principles (Wates Developments and Hammonds Estates LLP)
- Inconsistent with two very recently adopted neighbourhood plans (Little Baddow Neighbourhood Plan (2023) and the Sandon Neighbourhood Plan (2023)) as well as with the Reg 15 Submission Version of the emerging Danbury Neighbourhood Plan (2024) (Croudace Homes)
- The site is not needed in the Plan, the housing numbers could be met by extending North East Chelmsford Garden Community
- Building more at North East Chelmsford Garden Community would be more suitable as it has the infrastructure in place already, and would preserve this rural area, its good quality farmland and protect the community here (Little Baddow Society, Danbury Parish Council)
- All of the previous five options included additional growth in North East Chelmsford Garden Community so why is development not going there
- The housing numbers are not needed until the end of the Plan period so it is premature to consider the site now
- Development should be on brownfield sites, not greenfield sites
- This is Green Belt land and should not be built on
- Green Belt land to the southwest of Chelmsford should be considered instead (Boreham Conservation Society, Barratt David Wilson (Eastern Counties))
- A continuation of development between Regiment Way and the route of the new NE Bypass to the West of Broomfield would be better (Boreham Conservation Society)
- The site is in an unsuitable location, detached from Chelmsford. Development would result in urban sprawl and there should be no development to the east of the A12 as it is a defensible boundary (Boreham Conservation Society, Richborough, This Land Ltd, Croudace Homes, Barratt David Wilson (Eastern Counties))
- Unacceptable loss of high grade agricultural land (Sandon Parish Council, Great Baddow Parish Council, CPRE Essex, Boreham Conservation Society, Danbury Parish Council)
- There is no evidence showing actual land quality, only general agricultural land classifications have been provided (Sandon Parish Council, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- Additional crime in the area
- The site was not selected in the current adopted Local Plan and nothing has changed for the reasons it was not selected then, so it should not go ahead now (This Land Ltd, Danbury Parish Council, Coudace, Barratt David Wilson (Eastern Counties))
- Support the allocation of sites for Gypsy, Traveller and Travelling Showpeople housing needs (Basildon Borough Council)
- No evidence that a Gypsy and Traveller site is needed, and this is not a suitable location for one

- Support for additional employment in the area
- ‘Supporting on-site development’, bullet 3 should be amended as it is premature to assume the school will be an all-through school. However, the primary and secondary school should be co-located to provide the option of an all-through school, but a statutory process is required to be followed to determine the type(s) of school(s) established (Essex County Council)
- ECC’s document ‘SEND Sufficiency Plan For Engagement Autumn 2023’ identifies a lack of special educational needs schools in the east of Essex. Due to the number of schools proposed at site 16a, consider a SEND school for children aged up to 16 years (and beyond if possible) on the site for the provision of children and young people in east Essex (Maldon District Council)
- No infrastructure is in place to support this development (roads, healthcare – GPs and Hospitals, dentists, education, waste water and sewerage, emergency services) (Boreham Conservation Society, Woodham Walter Parish Council, Danbury Parish Council)
- The amount of infrastructure required will delay the delivery timeframe for the site (This Land Ltd, Croudace Homes)
- The site policy does not plan sufficiently for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments (Great Baddow Parish Council)
- Policy should be more positive requiring the development to provide renewable, low carbon and decentralised energy schemes on site (Essex County Council)
- Supports in principle the Movement and Access requirements for the site to provide substantive active and sustainable travel connections to the Chelmsford Urban Area and key destinations (Essex County Council)
- Site requirements should be amended to help ensure wider connectivity to and from the site is achieved (Essex County Council)
- Include in the site infrastructure measures to ensure the community is highly walkable with safe and lit pathways which connect forming a walking and cycling network to surrounding areas such as Danbury, Little Baddow, Sandon and Great Baddow (Great Baddow Parish Council)
- There are opportunities to improve the National Cycle Network in the area, including improvements to NCN1 which has some significant issues deterring its use (Cycling UK)
- The proposed cycle route link to Boreham junction will be very important to provide an active travel link to Beaulieu Station, North Chelmsford and a link to the countryside for leisure cyclists and is a better alternative to the existing cycle route (Cycling UK)
- No suitable mitigation measures set out for transport/highways impacts (Little Baddow Society)
- The impact assessment indicates that the development in this location will cause issues on the A12 between J17 and J19, which National Highways has no plans to mitigate

- The proposed mitigation to reduce congestion on the A414 acknowledges that this will drive more rat-running through Little Baddow and Sandon, exacerbating an already significant problem
- Traffic congestion will impact wider Villages and areas such as Little Baddow, Great Baddow, Bicknacre, Danbury, Sandon and Boreham, Woodham Walter, as well as residents from Maldon (Sandon Parish Council, Great Baddow Parish Council, Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Woodham Walter Parish Council, Danbury Parish Council)
- Unacceptable impact on the local (rat-running and congestion, including the A414 and Eves Corner) and strategic road (A12 capacity and junctions) networks with no evidence to support the proposal (Sandon Parish Council, Essex Waterways Ltd, Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, This Land Ltd, Woodham Walter Parish Council, Danbury Parish Council, Croudace Homes, Barratt David Wilson (Eastern Counties))
- Will result in delays along the A414 from Danbury for buses from SWF and Maldon unless dedicated bus lanes are factored into the road improvements along this section of the A414 (South Woodham Ferrers Residents Party, Danbury Parish Council)
- More traffic onto the A130/A12 causing further commuter delays at the Howe Green and Sandon junctions. There may also be negative effects on the use of the Sandon Park & Ride (South Woodham Ferrers Residents Party)
- Impact of wider projects including the Lower Thames crossing, A12 widening, Norwich to Tilbury Pylons, Bradwell power station on traffic flows has not been considered (Great Baddow Parish Council, Boreham Conservation Society)
- Impact of traffic using the new station has not been sufficiently accounted for in the traffic modelling (Sandon Parish Council)
- The impact of additional houses in North East Chelmsford Garden Community would be less on local roads and the A12 than this location
- No traffic modelling has taken place to support this site
- Traffic modelling evidence is insufficient and the impact of the proposed development on the main road network (A12 and A414) is highly likely to be severe (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Danbury Parish Council)
- Impact of construction traffic on already congested local road network (Chelmer Village Council)
- Encourage ongoing discussions with the Public Transport Operator and the Local Highway Authority to assist with the continuing delivery of infrastructure in Growth Area 3 (Basildon Borough Council)
- Further evidence on how active travel corridors will be made safe and lit to encourage sustainable travel is required (Great Baddow Parish Council)
- Challenge the deliverability of sustainable travel opportunities to deliver a 60% modal share for active and sustainable transport, particularly to the two

Stations. If not achieved the impact on the A12 cannot be effectively mitigated (Strutt and Parker Farms Ltd, Gladman Developments Ltd, This Land Ltd, Croudace Homes)

- Increased use of City Centre train station which is nearing capacity (Barratt David Wilson (Eastern Counties))
- Remove the word 'dedicated', from bullet point 6 under Movement and access, so that all avenues for providing car clubs with operators can be explored (Wates Developments and Hammonds Estates LLP)
- Agree with the policy requirement for significant new multi-functional green and blue infrastructure, and this should form the framework for delivering suitable SuDS and flood risk management and achieving 20% BNG (Anglian Water)
- Support that at least half the gross site area is multi-functional green and blue infrastructure, to provide sufficient space to maximise all opportunities including public access and amenity (Anglian Water)
- A distinction between public green spaces and habitats for wildlife should be explicitly clarified in the site policy (Environment Agency)
- While the Local Plan promotes habitat enhancement and biodiversity through measures like vegetation planting, and encourages designs that incorporate biodiversity features, we would like to see it specified that native species are used in all cases (Environment Agency)
- Add an explicit preference to retaining riparian corridors as public open space over private gardens. Include buffer zones alongside rivers reserved as public space, rather than private land that backs directly onto a river (Environment Agency)
- Supports the Historic and Natural Environment masterplanning principles to include conserve and enhance biodiversity and avoid adverse effects on the River Chelmer, and Old Hare Wood Local Wildlife Sites, Waterhall Meadows Essex Wildlife Trust Nature Reserve, and Long Spring Wood and Hall Wood ancient woodlands, and Blakes Wood and Lingwood Common SSSI. Also reference Danbury Common SSSI (National Trust)
- The site currently floods, and this will be made worse both within and around the site if built on. It could impact rivers if suitable waste water/sewerage facilities are not sufficient to deal with flooding and climate change impacting the health of waterway users as well as pollution to wildlife (Sandon Parish Council, Great Baddow Parish Council, Chelmer Valley Landscape Group)
- Insufficient modelling has been undertaken to review the full effects of flood risk, including future climate change and if this will adversely affect flooding (Great Baddow Parish Council, Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Danbury Parish Council)
- Significant areas of the allocation lie within Flood Zone 2 and 3. The site allocation does not pass the sequential test as there are reasonably available sites appropriate for the proposed development in areas with a lower risk of

flooding (Strutt and Parker Farms Ltd, Richborough, This Land Ltd, Tayor Wimpey)

- Pollution and harm to the river environment from the development, including the Chelmer and Blackwater Navigation Landscape Conservation Area (Sandon Parish Council, Great Baddow Parish Council, Chelmer Valley Landscape Group, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Woodham Walter Parish Council)
- Additional pressure on the Chelmer & Blackwater Navigation for recreational purposes including walking, cycling, canoeing, paddle-boarding and boating as well as visitor parking without any proposals to provide improvements or mitigation (Essex Waterways Ltd, Chelmer Valley Landscape Group)
- The proposed new bridge will split the development in half, be unduly prominent in the river valley, create noise and moving visual intrusion, and be detrimental to the character and appearance of the designated Chelmer & Blackwater Navigation Conservation Area and views from Boreham House. No amount of landscape enhancement will mitigate the harm it will cause (Essex Waterways Ltd, Chelmer Valley Landscape Group, Boreham Conservation Society)
- Impact on users' enjoyment of existing footpaths and rivers for recreation and pleasure
- Harm to the rural landscape and urbanisation of the area, including Waterhall Meadow, an ancient flood meadow (Sandon Parish Council, CPRE Essex, Little Baddow Society, Boreham Conservation Society, Essex Wildlife Trust, Danbury Parish Council, Croudace Homes)
- The impact on the landscape would be damaging and hard to mitigate (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- Increased air pollution
- Harm to the natural environment and protected areas of wildlife/habitats in the vicinity (Sandon Parish Council, CPRE Essex, Essex Wildlife Trust, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Richborough)
- Harm to wildlife in the area and loss of habitat for species including, muntjac, bats, badgers, foxes, birds (Sandon Parish Council, Little Baddow Society, Boreham Conservation Society, Essex Wildlife Trust, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- There are several areas of Lowland Mixed Deciduous Woodland, which are Priority Habitat Woodland, within or adjacent to the site which need to be considered. Lowland Mixed Deciduous Woodlands are on the Priority Habitat Inventory, England. Fragmentation of woodland reduces its ecological value and woodlands can suffer loss or deterioration from development nearby (Forestry Commission England)
- Any planning application for major residential development should be required to include a robust assessment of the residual recreational impact of the development on the nearby SSSI's, local wildlife sites and ancient woodlands, and that mitigation measures are included where appropriate. This should consider cumulative development in the area (National Trust, Natural

England, Essex Wildlife Trust, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Richborough)

- The policy does not mention the site location is within the RAMS zone of influence, meaning that an assessment of suitable alternative natural greenspace may be needed (Natural England)
- The site has been submitted for consideration for it to be designated as an Area of Outstanding Natural Beauty/National Landscape and proposals for development are premature until this has been considered by Natural England (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Danbury Parish Council, Croudace Homes)
- Undertake a Heritage Impact Assessment (HIA) in advance of Regulation 19 to determine whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable incorporate any mitigation and enhancement measures into the site policy (Historic England)
- Impact on heritage and archaeological assets in the area (Little Baddow Society, Little Baddow History Centre, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Richborough)
- Maintain the character of and biodiversity along Graces Walk (Cycling UK)
- Agree with the principle of bullet 4 of Historic and Natural Environment, but adjust to reflect that all of the listed buildings are outside of the development's ownership, rendering it impossible to enhance the structures themselves (Wates Developments and Hammonds Estates LLP)
- The policy wording in relation to heritage assets utilises the statutory language of 'preservation'. Suggest a more appropriate term would be 'conservation', to reflect national planning policy (Wates Developments and Hammonds Estates LLP)
- Remove Church Lane as a 'Protected Lane' as the Protected Lanes Study for Chelmsford Borough Council: Summary Report 2009 states that it does not meet the 'protected lane' threshold (Wates Developments and Hammonds Estates LLP)
- It is not yet known whether the site contains a viable minerals resource that would require extraction prior to development (Little Baddow Society, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Croudace Homes, Taylor Wimpey)
- Ensure any Anglian Water assets within and adjacent to the site that may be affected by the development are reflected in the site policy including a requirement for appropriate safeguarding of suitable access for the maintenance of foul and surface water drainage infrastructure (Anglian Water)
- Expand policy to require the development to prepare a strategy for responding to the National Grid Electricity Transmission plc (NGET) overhead transmission lines present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design (National Grid Electricity Transmission)
- Houses should not be built close to the pylons on site

- The National Grid Transmission Overhead Lines, UK Power Networks Overhead Lines and Cadent Local High Pressure Gas Mains constrain the site for development (This Land Ltd)
- Support the reference in 'Site infrastructure requirements' regarding early years, primary and secondary provision subject to some minor amended wording including adding a reference to accordance with Policy S10 (Essex County Council)
- Support for the provision of open spaces, sports, and physical activity provided in the policy (Sport England)
- Under the subheading 'site infrastructure requirements' and in bullet point 8 at the end add "and police facilities as required by Essex Police" (Essex Police)
- Uncertainty over the viability of the site in respect of the scale and cost of highways improvements that will be required (Strutt and Parker Farms Ltd, Richborough, Gladman Developments Ltd, Taylor Wimpey)
- The site is in multiple ownerships and therefore constraints associated with land values and timely delivery (Richborough)
- Support bullet points 1-3 of Site Infrastructure Requirements, but welcome further flexibility through additional text stating "or the equivalent land take needed to deliver the school places identified as needed by the Local Authorities with Responsibility for Education (LARE)", given the requirement could flex over time. References to the education provider should be renamed as the Local Authorities with Responsibility for Education (Wates Developments and Hammonds Estates LLP)
- Support the principle of providing contributions towards the facilitation of necessary highway transport infrastructure under bullets 4 and 5 Site infrastructure requirements, but add clarity that the appropriate improvements will be defined by the Transport Assessment (Wates Developments and Hammonds Estates LLP)
- In relation to bullet 6 of Site Infrastructure Requirements clarification is sought in the wording that the definition of bus-based rapid transit refers only to the sustainable modes bridge over the A12, and does not require the provision of dedicated bus corridors throughout the development (Wates Developments and Hammonds Estates LLP)
- Bullet 8 of Site Infrastructure Requirements could be interpreted as open-ended, add additional wording so it reads "Provide and/or financial contributions to healthcare provision as required by the NHS Mid and South Essex Integrated Care Board to address the needs of the development." (Wates Developments and Hammonds Estates LLP)
- Stewardship principles are supported and should be established early on with an asset schedule prepared to outline management and maintenance of assets (Essex County Council)
- Do not support the description of a masterplanning principle within Para. 7.224 (Section 3) that there should be a "choice of unimpeded route corridors within the developed area, able to carry rapid transit services". Whilst bus priority is supported in principle, this could suggest a need for a continuous dedicated bus-only corridor through the site. The principle of bus priority and

rapid transit can be achieved through a combination of measures (Wates Developments and Hammonds Estates LLP)

- Add a new line at the end of para. 7.362 as follows “Appropriate funding will also need to be made for police facilities to provide for community safety, cohesion and policing as required by Essex Police.” (Essex Police)
- Joint working between the Councils is needed to ensure there are no detrimental impacts on Basildon Borough and its residents from development in Growth Area 3 (Basildon Borough Council).

Strategic Growth Site 16B – Land adjacent to A12 Junction 18 Employment Area

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Growth Site 16B – Land adjacent to A12 Junction 18 Employment Area	5	4331	4337	4348

It should be noted that in some cases, members of the public raised similar points to stakeholders listed in brackets. This is especially the case in relation to comments made by Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group to this Strategic Growth Site which have been replicated and amplified by many individuals. To avoid duplication, these comments have not been repeated in the public comments.

Summary of Representations – main issues and suggested changes:

- Inconsistent with two very recently adopted neighbourhood plans (Little Baddow Neighbourhood Plan (2023) and the Sandon Neighbourhood Plan (2023)) as well as with the Reg 15 Submission Version of the emerging Danbury Neighbourhood Plan (2024)
- The site is not needed in the Plan, the housing numbers could be met by extending North East Chelmsford Garden Community
- Building more at North East Chelmsford Garden Community would be more suitable as it has the infrastructure in place already, and would preserve this rural area, its good quality farmland and protect the community here (Little Baddow Society, Danbury Parish Council)
- All of the previous five options included additional growth in North East Chelmsford Garden Community so why is development not going there
- The housing numbers are not needed until the end of the Plan period so it is premature to consider the site now
- Development should be on brownfield sites, not greenfield sites
- This is Green Belt land and should not be built on
- Green Belt land to the southwest of Chelmsford should be considered instead (Boreham Conservation Society)



- A continuation of development between Regiment Way and the route of the new NE Bypass to the West of Broomfield would be better (Boreham Conservation Society)
- The site is in an unsuitable location, detached from Chelmsford. Development would result in urban sprawl and there should be no development to the east of the A12 as it is a defensible boundary (Boreham Conservation Society)
- Unacceptable loss of high grade agricultural land (CPRE Essex, Boreham Conservation Society, Danbury Parish Council)
- There is no evidence showing actual land quality, only general agricultural land classifications have been provided (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- Additional crime in the area
- The site was not selected in the current adopted Local Plan and nothing has changed for the reasons it was not selected then, so it should not go ahead now (Danbury Parish Council)
- No evidence that a Gypsy and Traveller site is needed, and this is not a suitable location for one
- Support the cluster of employment opportunities coming forward at Locations 3, 16a and 16b that will help strengthen Chelmsford's economy (Wates Developments and Hammonds Estates LLP, CNG Fuels)
- Support for the range and types of uses in the allocation but consider it should be a minimum of 55,000 sqm, or state in the policy that more than 43,000 sqm will be supported where it can be successfully demonstrated as deliverable through the planning application processes (Pigeon (Sandon) Ltd)
- The site is in single ownership and there has been pre-application engagement so there is no need for the requirement for a masterplan in the policy. If the requirement remains request paragraph 7.386 is amended to read 'The development of the site will be subject of a masterplan agreed with the Council prior to the determination of a planning application' (Pigeon (Sandon) Ltd)
- Standardise the buildings within the site for sustainability and emphasise active travel movement to the site for employees from the local area (Great Baddow Parish Council)
- The site should provide employment for higher paid/skilled employment areas. In particular, Business Innovation Hub, Corporate Offices, Research and Development Centres, Co-Working Spaces, Incubators and Accelerators, High-Tech Manufacturing, commitments to apprenticeships and working with local schools to develop career pathways, and research and new methods of food production, to mitigate the decrease in agricultural land (Great Baddow Parish Council)
- Employment space should be closer to the City Centre with better transport links
- The employment space should be smaller than proposed
- Support for additional employment in the area
- Support Movement and Access bullet 2 that site access must be provided "in a manner that complements and does not prejudice access to East Chelmsford Garden Community (Hammonds Farm)" (Wates Developments and Hammonds Estates LLP)

- Site can come forward via an access which is completely independent of Hammonds Farm and does not prejudice access to Hammonds Farm. Notwithstanding, fully committed to working collaboratively with 16a to ensure site access arrangements and connections are deliverable in respect of both sites (Pigeon (Sandon) Ltd)
- Essex County Council's document 'SEND Sufficiency Plan For Engagement Autumn 2023' identifies a lack of special educational needs schools in the east of Essex. Due to the number of schools proposed at site 16a, consider the development of a SEND school for children aged up to 16 years (and beyond if possible) to be located to the east of Chelmsford for the provision of children and young people in east Essex (Maldon District Council)
- Remove reference to early years and childcare nursery in paragraph 7.389 as there is not a policy requirement for one on this site (Essex County Council)
- No infrastructure in place to support this development (roads, healthcare – GPs and Hospitals, dentists, education, waste water and sewerage, emergency services) (Boreham Conservation Society, Woodham Walter Parish Council, Danbury Parish Council)
- There are opportunities to improve the National Cycle Network in the area, including improvements to NCN1 which has some significant issues deterring its use (Cycling UK)
- The proposed cycle route link to Boreham junction will be very important to provide an active travel link to Beaulieu Station, North Chelmsford and a link to the countryside for leisure cyclists and is a better alternative to the existing cycle route (Cycling UK)
- Site infrastructure requirements, bullet 1, amend to read 'Provide safe and convenient pedestrian and cycle links to Sandon Park and Ride and to the east of the site, and routes associated with the East of Chelmsford allocations including East Chelmsford Garden Community (Hammonds Farm)' (Essex County Council)
- Pedestrian and cycle links to the south are not necessarily the most desirable in terms of connectivity and desire lines for movement. The policy should allow for greater flexibility including exploring options for links to the east of the site to connect to the wider road and footpath network (Pigeon (Sandon) Ltd)
- No suitable mitigation measures set out for transport/highways impacts (Little Baddow Society)
- There should be an emphasis of active and sustainable travel for workers on the site (Great Baddow Parish Council)
- Concern over the impact on A12 Junction 18 and if congested traffic will use local roads (Great Baddow Parish Council)
- The impact assessment indicates that the development in this location will cause issues on the A12 between J17 and J19, which National Highways has no plans to mitigate
- The proposed mitigation to reduce congestion on the A414 acknowledges that this will drive more rat-running through Little Baddow and Sandon, exacerbating an already significant problem
- Encourage ongoing discussions with the Public Transport Operator and the Local Highway Authority to assist with the continuing delivery of infrastructure in Growth Area 3 (Basildon Borough Council)

- Traffic congestion will impact wider Villages and areas such as Little Baddow, Great Baddow, Bicknacre, Danbury, Sandon and Boreham, Woodham Walter, as well as residents from Maldon (Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Woodham Walter Parish Council, Danbury Parish Council)
- Unacceptable impact on the local (rat-running and congestion, including the A414 and Eves Corner) and strategic road (A12 capacity and junctions) networks with no evidence to support the proposal (Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Woodham Walter Parish Council, Danbury Parish Council)
- Will result in delays along the A414 from Danbury for buses from SWF and Maldon unless dedicated bus lanes are factored into the road improvements along this section of the A414 (South Woodham Ferrers Residents Party, Danbury Parish Council)
- More traffic onto the A130/A12 causing further commuter delays at the Howe Green and Sandon junctions. There may also be negative effects on the use of the Sandon Park & Ride (South Woodham Ferrers Residents Party)
- Impact of wider projects including the Lower Thames crossing, A12 widening, Norwich to Tilbury Pylons, Bradwell power station on traffic flows has not been considered (Boreham Conservation Society)
- The impact of additional houses in North East Chelmsford Garden Community would be less on local roads and the A12 than this location
- No traffic modelling has taken place to support this site
- Traffic modelling evidence is insufficient and the impact of the proposed development on the main road network (A12 and A414) is highly likely to be severe (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Danbury Parish Council)
- The site currently floods, and this will be made worse both within and around the site if built on. This could impact rivers if suitable waste water/sewerage facilities are not sufficient to deal with flooding and climate change impacting the health of waterway users as well as pollution to wildlife (Chelmer Valley Landscape Group)
- Insufficient modelling has been undertaken to review the full effects of flood risk, including future climate change and if this will adversely affect flooding (Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Danbury Parish Council)
- Significant areas of the allocation lie within Flood Zone 2 and 3. The site allocation does not pass the sequential test as there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding
- Pollution and harm to the river environment from the development, including the Chelmer and Blackwater Navigation Landscape Conservation Area (Chelmer Valley Landscape Group, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Woodham Walter Parish Council)

- Additional pressure on the Chelmer & Blackwater Navigation for recreational purposes including walking, cycling, canoeing, paddle-boarding and boating as well as visitor parking without any proposals to provide improvements or mitigation (Chelmer Valley Landscape Group)
- The proposed new bridge will split the development in half, be unduly prominent in the river valley, create noise and moving visual intrusion, and be detrimental to the character and appearance of the designated Chelmer & Blackwater Navigation Conservation Area and views from Boreham House. No amount of landscape enhancement will mitigate the harm it will cause (Essex Waterways Ltd, Chelmer Valley Landscape Group, Boreham Conservation Society)
- Impact on users' enjoyment of existing footpaths and rivers for recreation and pleasure
- Harm to the rural landscape and urbanisation of the area, including Waterhall Meadow, an ancient flood meadow (CPRE Essex, Little Baddow Society, Boreham Conservation Society, Danbury Parish Council)
- The impact on the landscape would be damaging and hard to mitigate (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- Increased air pollution
- Harm to the natural environment and protected areas of wildlife/habitats in the vicinity (CPRE Essex, Essex Wildlife Trust, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- Harm to wildlife in the area and loss of habitat for species including, muntjac, bats, badgers, foxes, birds (Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- There are several areas of Lowland Mixed Deciduous Woodland, which are Priority Habitat Woodland, within or adjacent to the site which need to be considered. Lowland Mixed Deciduous Woodlands are on the Priority Habitat Inventory, England. Fragmentation of woodland reduces its ecological value and woodlands can suffer loss or deterioration from development nearby (Forestry Commission England)
- Any planning application for major residential development at the East Chelmsford Growth location should be required to include a robust assessment of the residual recreational impact of the development on the nearby SSSI's, local wildlife sites and ancient woodlands, and that mitigation measures are included where appropriate. This should take account of cumulative development in the area (Essex Wildlife Trust, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- The site has been submitted for consideration for it to be designated as an Area of Outstanding Natural Beauty/National Landscape and proposals for development are premature until this has been considered by Natural England (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group, Danbury Parish Council)
- Supportive of the Historic and Natural Environment, and Design and Layout principles (Pigeon (Sandon) Ltd)
- A Heritage Impact Assessment (HIA) should be undertaken in advance of Regulation 19 to determine whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement

measures. If the site is deemed suitable, incorporate any mitigation and enhancement measures into the site policy (Historic England)

- Impact on heritage and archaeological assets in the area (Little Baddow Society, Little Baddow History Centre, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- It is not yet known whether the site contains a viable minerals resource that would require extraction prior to development (Little Baddow Society, Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group)
- The site falls below the threshold for the need to carry out a Minerals Resource Assessment so remove requirement from the site policy (Essex County Council)
- Houses should not be built close to the pylons on site
- Support for the provision of open spaces, sports, and physical activity provided in the policy (Sport England)
- The delivery of Site 16b is conditional upon the masterplan of Site 16a, and consequently the expectation of delivery by 2030 maybe unrealistic (Greystoke CB)
- Buildings should be sustainably built (Great Baddow Parish Council)
- A Waste Infrastructure Assessment is not required as the affected area will fall outside of the proposed red line boundary for future planning applications (Pigeon (Sandon) Ltd)
- Joint working between the Councils is needed to ensure there are no detrimental impacts on Basildon Borough and its residents from development in Growth Area 3 (Basildon Borough Council).

#### Location 10 – South Woodham Ferrers

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Location 10 – South Woodham Ferrers	2	5	25	25

Summary of Representations – main issues and suggested changes:

- Support expressed (Sport England)
- Traffic concerns from this site and other sites proposed in both Chelmsford and Maldon
- Proposed capacity improvements on A132/B1012 are not sufficient
- Retail offer in SWF is limited, increase the retail offering would provide employment opportunities
- Improve bus services that connect to Chelmsford, Baddow, Danbury and Bicknacre and employment areas
- Better pedestrian and cycle connection is needed including safe crossing points on Burnham Road
- Rail service is at capacity with little or no potential for future expansion (South Woodham Ferrers Residents Party)
- Increase inclusivity for accessibility and teens/young adults

- Flooding concerns
- New education and healthcare facilities are needed
- Habits have changed following Covid. Use more brownfield sites for housing need and retain green space for future generations and wildlife (South Woodham Action Group)
- Create a public woodland north of the site managed in perpetuity to encourage habitat improvement and countryside access (South Woodham Ferrers Residents Party)
- Minor policy change suggested to policy and supporting text to add 'and police facilities as required by Essex Police' (Essex Police)
- Refer to 'multifunctional' green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Amend to reflect the provision of proportionate financial contributions towards the co-located primary and early years nursery (Essex County Council)
- Refer to active and sustainable travel (Essex County Council)
- Provide a safe traffic free environment around school pedestrian entrances in line with in ECC's Developers' Guide to Infrastructure Contributions (Essex County Council)
- Support expressed but policy should remain generic in terms of its requirements including around 1,200 homes, around 1,000 sqm, avoid 'maximise', and for proposals to generally accord with an approved masterplan (Vistry Group)
- Amend to ensure CIL compliant requirements and reflect evidence provided with the recent planning application in terms of infrastructure (Vistry Group)
- There is limited capacity for growth at SWF Water Recycling Centre. Policy should require the need to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site, including sewer connections and mitigation within the sewerage network (Anglian Water)
- The South East (Inshore) Marine Plan must be considered and a Marine Conservation Zone (MCZ) assessment may need to be undertaken. Project-level Habitats Regulations Assessment (HRA) must consider all impacts taken alone or in combination (Natural England)
- Refer to the marine/coastal/intertidal element particularly where both terrestrial and marine habitats have the potential to be impacted by the policy and interpretation of the South East Marine Plan (Marine Management Organisation)
- Expand policy to require the development to prepare a strategy for responding to the National Grid Electricity Transmission plc (NGET) overhead transmission lines within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design (National Grid Electricity Transmission).

#### Location 11 – Bicknacre

#### Growth Site 11a – South of Bicknacre

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site 11a – South of Bicknacre	1	2	8	8

Summary of Representations – main issues and suggested changes:

- Support for 42 new homes whilst acknowledging the adopted plan was for 35 new homes (Woodham Ferrers and Bicknacre Parish Council)
- The site is near Thrift Wood SSSI and all identified impacts on the designated features of the SSSI will need to be considered. The cumulative effect on Thrift Wood SSSI of all the Bicknacre sites should be considered (Natural England)
- Minor policy changes suggested relating to green and blue infrastructure, education provision and pedestrian and cycle connections (Essex County Council)
- There are woodlands on the site or nearby including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with the NPPF. The Council is also referred to Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- Amend to reflect what has occurred on site, including the removal of large sections of hedgerow along the Main Road
- Insufficient infrastructure to support the development, including lack of public transport, the condition of roads and capacity at doctors' surgery
- Will place further strain on existing facilities
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development.

#### Growth Site 11b – Land at Kingsgate, Bicknacre

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site 11b – Land at Kingsgate, Bicknacre	0	54	64	64

Summary of Representations – main issues and suggested changes:

- Object to the allocation. Reasons include the requirement for further housing in Bicknacre has already been satisfied since the adoption of the existing Local Plan (2020) and we are discussions to find an affordable housing site; any further housing need could be accommodated at Hammonds Farm or elsewhere; flooding concerns and drainage capacity and loss of Grade 3 agricultural land (Woodham Ferrers and Bicknacre Parish Council)
- All Bicknacre sites should take account of the cumulative effect on Thrift Wood SSSI (Natural England)

- There are woodlands on the site or nearby including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with the NPPF. The Council is also referred to Natural England and Forestry Commission’s Standing Advice on Ancient Woodland (Forestry Commission England)
- The site is approximately 300m of Bicknacre Priory Scheduled Monument. A Heritage Impact Assessment (HIA) should be undertaken in advance of Regulation 19 to determine whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable it is expected that mitigation and enhancement measures are incorporated into the Policy (Historic England)
- Minor policy changes suggested relating to education provision for clarification and consistency (Essex County Council)
- Insufficient infrastructure to support the development, including lack of public transport, police and fire services, the condition of roads and capacity at doctors’ surgery and the school
- Will place further strain on existing facilities and utilities
- Bicknacre has met its housing requirement with circa. 77 new homes being built/under construction and further affordable housing may be delivered – the village does not need more housing/there is sufficient housing to meet local need
- Increase in traffic, congestion and on street parking and the degradation of the condition of existing roads – concerns on pedestrian and road safety and quality of life
- Impact on settlement character and the community
- Concerns on flooding, including Sandon Brook overflowing
- Drainage issues/lack of capacity and sewerage concerns
- Loss of agricultural land
- Impact on wildlife and their habitats
- Noise and air pollution impacts – Chelmsford’s Air Quality Strategy June 2022 is out of date and air pollution is likely to increase
- Concerns on pedestrian safety, including children and the vulnerable and the lack of/suitable existing footways within the village
- Impact on adjacent bridleway
- Concerns on antisocial behaviour
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development.

Growth Site 11c – Land West of Barbrook Way, Bicknacre

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site 11c – Land West of Barbrook Way, Bicknacre	0	104	123	123



## Summary of Representations – main issues and suggested changes:

- Support in principle but a greater site area and quantum of development should be allocated. The allocation ignores the Council's evidence base of the site's suitability and sustainability to deliver more houses – the wording of the policy is not justified or effective (Wellbeck Strategic Land V Limited)
- Consider the criteria of the Strategic Housing and Employment Land Availability Assessment has been applied inconsistently – the site should score higher (Wellbeck Strategic Land V Limited)
- Object to the allocation. Reasons include the requirement for further housing in Bicknacre has already been satisfied since the adoption of the existing Local Plan (2020) and we are discussions to find an affordable housing site; any further housing need could be accommodated at Hammonds Farm or elsewhere; flooding concerns and drainage capacity; loss of Grade 3 agricultural land and there is a ransom strip between Barbrook Way and the site so the site is not deliverable (Woodham Ferrers and Bicknacre Parish Council)
- All Bicknacre sites should take account of the cumulative effect on Thrift Wood SSSI (Natural England)
- There are woodlands on the site or nearby including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with the NPPF. The Council is also referred to Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- Development would not affect any designated heritage assets (Historic England)
- Minor policy changes suggested relating to education provision for clarification and consistency (Essex County Council)
- Insufficient infrastructure to support the development, including lack of public transport, police and fire services, the condition of roads and capacity at doctors' surgery and the school
- Will place further strain on existing facilities and utilities
- Bicknacre has met its housing requirement with circa. 77 new homes being built/under construction and further affordable housing may be delivered – the village does not need more housing/there is sufficient housing to meet local need
- Increase in traffic, congestion and on street parking and the degradation of the condition of existing roads – concerns on pedestrian and road safety and quality of life
- Impact on settlement character and the community
- Concerns on flooding, including Sandon Brook overflowing
- Drainage issues/lack of capacity and sewerage concerns
- Loss of Grade 3 agricultural land – the site has always been used for animal grazing
- Impact on wildlife and their habitats
- Disagree with the site's rating in the Strategic Housing and Employment Land Availability Assessment – it has been incorrectly scored and should be lower
- Impact on neighbour amenity

- Junction/road safety concerns, including the location of the drop off point of The Sandon School bus at Barbrook Way/Priory Road
- Noise and air pollution impacts – Chelmsford’s Air Quality Strategy June 2022 is out of date and air pollution is likely to increase
- Concerns on pedestrian safety, including children and the vulnerable and the lack of/suitable existing footways within the village
- There is a ransom strip at the entrance at the site – the site is not deliverable
- Site contributes to community wellbeing
- Concerns on soil composition and subsidence
- There is a water main running through the site – homes cannot be built on this or within its easements
- Concerns for protected trees within and near the site
- Concerns on antisocial behaviour
- Heritage impacts
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development.

Location 12 – St Giles, Bicknacre

Growth Site 12 – St Giles, Moor Hall Lane, Bicknacre

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site 12 – St Giles, Moor Hall Lane, Bicknacre	1	1	5	5

Summary of Representations – main issues and suggested changes:

- Support the allocation (Woodham Ferrers & Bicknacre Parish Council)
- Minor policy changes suggested relating to ‘multifunctional’ green infrastructure and pedestrian and cycle connections (Essex County Council)
- All Bicknacre sites should take account of the cumulative effect on Thrift Wood SSSI (Natural England)
- Limited existing infrastructure to support the development, including public transport, the condition of road and capacity at doctors’ surgery
- Will place further strain on existing facilities.

Location 13 – Danbury

Strategic Growth Site Policy 13 – Danbury

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Strategic Growth Site Policy 13 – Danbury	1	3	9	9

Summary of Representations – main issues and suggested changes:

- Add additional text in relation to safe and convenient pedestrian and cycle connections, and active and sustainable travel (Essex County Council)
- Include reference to traffic management measures at Eves Corner (Essex County Council)
- Add reference to the proximity to proposed schools and social infrastructure offered by the Hammonds Farm proposal (Wates Developments and Hammonds Estates LLP)
- Recommend an additional policy to recognise the cumulative recreational pressure on SSSIs and wildlife sites (Natural England)
- There are woodlands on or in proximity to the allocation including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with the NPPF and the Council is referred to the Natural England and Forestry Commission’s Standing Advice on Ancient Woodland (Forestry Commission England)
- Allocation is welcomed but it could deliver a greater number of homes (Martin Grant Homes)
- New housing could come forward in Danbury outside of the Neighbourhood Plan process if housing needs are not being met within an expected timeframe (Richborough)
- Concern about the recreational pressure and physical damage on vulnerable sites and land within the National Trust’s ownership (National Trust)
- Additional site is promoted off Runsell Lane (Gleeson Land).

#### Location 17 – East Hanningfield

##### Growth Site 17a – Land North of Abbey Fields, East Hanningfield

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site 17a – Land North of Abbey Fields, East Hanningfield	1	16	18	18

Summary of Representations – main issues and suggested changes:

- Support the allocation and policy requirements, subject to the relevant legislation and planning policy (Chelmsford Diocese Board of Finance)
- A greater quantum of development may be possible on the site (Chelmsford Diocese Board of Finance)

- The delivery of site could be within two years of the adoption of the Local Plan (Chelmsford Diocese Board of Finance)
- Development would not affect any designated heritage assets (Historic England)
- Minor policy changes suggested relating to education provision for clarification and consistency (Essex County Council)
- Development would be out of keeping with the existing settlement pattern
- Impact on local services
- Lack of public transport
- Site access is below standards
- Junction/road safety concerns
- Concerns on flooding
- Increase/exacerbation of traffic, congestion and on street parking in Abbey Fields
- No sewerage capacity
- Loss of wildlife habitat/impact on biodiversity, trees (including preserved trees) and landscaping
- Noise and pollution impacts
- A right of access by the owners of the adjacent field may impact on the allocation.

**Growth Site Policy 17b – Land East of Highfields Mead, East Hanningfield**

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Growth Site Policy 17b – Land East of Highfields Mead, East Hanningfield	1	15	18	18

Summary of Representations – main issues and suggested changes:

- Support the allocation (Hawridge Land and Mrs A Mossman)
- The allocation boundary should reflect the total site area (circa 1.25ha) and the quantum of housing should be flexible/increased (circa 30-35 dwellings) to maximise the site’s deliverability (Hawridge Land and Mrs A Mossman)
- Development would not affect any designated heritage assets (Historic England)
- Minor policy changes suggested relating to education provision for clarification and consistency (Essex County Council)
- Limited existing infrastructure to support the development, including public transport and capacity at doctors’ surgery and school
- Loss of wildlife habitat/impact on biodiversity, trees and landscaping
- Increase in traffic, congestion and on street parking
- Concerns on pedestrian safety
- Concerns on flooding and drainage

- Impact on settlement character
- Impact on neighbour amenity
- No sewerage and water capacity
- Noise and pollution impacts.

### Special Policy Areas (SPA)

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Special Policy Areas (paragraphs 7.464-7.465)	0	0	0	0
SPA1 – Broomfield Hospital Special Policy Area	0	1	1	1
SPA2 – Chelmsford City Racecourse Special Policy Area	0	0	1	1
SPA3 – Hanningfield Reservoir Special Policy Area	0	1	3	3
SPA4 – RHS Hyde Hall Gardens Special Policy Area	0	0	2	2
SPA5 – Sandford Mill Special Policy Area	1	0	3	3
SPA6 – ARU Writtle Special Policy Area	2	1	7	7

#### SPA1 – Broomfield Hospital Special Policy Area

Summary of Representations – main issues and suggested changes:

- Support SPA rationale. Designate the former BAE Systems site as a SPA given its unique and historical context and potential need to provide future specialist electronic technology floorspace related to defence (Rosehart Properties Ltd).

#### SPA2 – Chelmsford City Racecourse Special Policy Area

Summary of Representations – main issues and suggested changes:

- For consistency with other parts of the plan, amend policy to refer to ‘active and sustainable means of travel’ (Essex County Council).

#### SPA3 – Hanningfield Reservoir Special Policy Area

Summary of Representations – main issues and suggested changes:

- Welcome involvement early in application process to comment on details of avoidance and mitigation measures deemed necessary for proposed

developments that may impact on Hanningfield Reservoir SSSI (Natural England)

- Support SPA policy approach but expand policy to include proposals for renewable energy which would reduce reliance on the grid and contribute towards achieving climate change goals (Essex & Suffolk Water)
- Remove policy requirement to show a demonstrable need for a renewable energy scheme as the treatment works is a regulated industry (Essex & Suffolk Water)
- Delete requirement for very special circumstances for water infrastructure and ancillary development to demonstrable need and be directly associated with the role, function and operation of the operation of the site (Essex & Suffolk Water)
- Include new text to support, in principle, appropriate proposals including additional infrastructure requirements linking the site to the wider water infrastructure network, renewable energy and leisure activities (Essex & Suffolk Water).

#### SPA4 – RHS Hyde Hall Gardens Special Policy Area

Summary of Representations – main issues and suggested changes:

- For consistency with other parts of the plan, amend policy to refer to ‘active and sustainable means of travel’ (Essex County Council)
- RHS Hyde Hall causes significant traffic congestion at its special events, this will worsen as it expands but there is no provision to address this or improve the access road in application 21/01961/OUT.

#### SPA5 – Sandford Mill Special Policy Area

Summary of Representations – main issues and suggested changes:

- For consistency with other parts of the plan, amend policy to refer to ‘active and sustainable means of travel’ (Essex County Council)
- Fully support. This SPA needs to move forward as quickly as possible (Essex Waterways Ltd).

#### SPA6 – ARU Writtle Special Policy Area

Summary of Representations – main issues and suggested changes:

- Support. The facility is located within Writtle Key Service Settlement and is significant for educational excellence and driving the local economy. As such, the plan should provide new housing allocations near the ARU campus (Vistry Group)
- For consistency with other parts of the plan, amend policy to refer to ‘active and sustainable means of travel’ and ‘safe and convenient’ cycling and walking connectivity (Essex County Council)

- Expand to note the importance of ARU Writtle to supporting local employment to reduce inequality, opportunities to shift to a greener economy and investment into the rural economy (Essex County Council)
- Support the policy principles but the current designation will not ensure future development reflects the operational and functional requirements of ARU Writtle. The need for its growth and success is reflected throughout the plan. As such, amend policy to acknowledge that ARU intends to grow and expand to sustain its long-term future success and to delete the requirement to identify a 'demonstrable need' every time an application is determined (ARU)
- Expand the SPA boundaries of the Titchmarsh Campus and Rural Education and Training Centre along Cow Watering Lane to reflect the new and improved facilities/development that will be required (ARU)
- Inclusion of the Titchmarsh Campus does not affect any designated heritage assets (Historic England)
- Support sympathetic improvements to the ARU Writtle site in line with Green Belt policy. The Norwich to Tilbury powerline proposals will have a significant impact on ARU Writtle (Writtle Parish Council).

### **Protecting and Securing Important Assets**

This section of the consultation document provides other non-strategic policies of the Local Plan that will shape Chelmsford's development opportunities whilst protecting its important physical attributes.

#### **Securing the right types of homes**

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Policy DM1 – Size and Type of Housing	3	9	20	20
Policy DM2 – Affordable Housing and Exception Sites	3	4	19	19
Policy DM3 – Policy DM3 – Gypsy, Traveller and Travelling Showpeople Sites	2	0	3	3

#### **Policy DM1 – Size and Type of Housing**

Summary of Representations – main issues and suggested changes:

- Support for the requirement for 100% of all new homes to be accessible and adaptable to enable people to live independently for longer (Mid and South Essex Integrated Care Board, Essex County Council, Dominus Chelmsford Limited)
- ECC has commissioned 'Supported and Specialist Housing and Accommodation Needs Assessment' which will inform the Specialist

Residential Accommodation requirements when complete (Essex County Council)

- Give more support and priority to build to rent (Wates Development and Hammonds Estates LLP, Dominus Chelmsford Limited)
- Self and custom build plots should be taken forward on standalone sites not part of strategic housing allocations (Bloor Homes – Eastern)
- The 5% requirement for self and custom build plots should be capped at 5% (Bloor Homes – Eastern)
- Self-build homes should be encouraged rather than required by evidence of local need (Whirlledge & Nott, Croudace)
- The impact of self-build homes on development viability should also be considered (Whirlledge & Nott, Croudace)
- The Specialist Residential Accommodation requirement is too generic and needs to specifically allocate land to meet older persons housing need identified in the SHNA (Bloor Homes – Eastern, Sedum Ltd)
- Provision of Specialist Residential Accommodation for older and disabled people is too low to meet the identified needs and does not provide enough certainty that these needs will be met in a planned way which supports the optimum arrangement of support services (Lewis and Scott Retirement Living)
- A dedicated specialist housing policy which allows development adjacent to defined settlement boundaries would be more effective (Lewis and Scott Retirement Living)
- The process for determining when a commuted sum in lieu of on-site provision of Specialist Residential Accommodation is acceptable, how the sums will be used and what part ECC plays in this should be clarified (Essex County Council)
- All new homes should be required to have solar panels built in (Sandon Parish Council)
- Disagree with the requirement for 100% of new dwellings to be accessible and adaptable based on the additional cost of achieving these standards (Chelmsford Garden Community Consortium, Vistry)
- The policy might become outdated as building regulations and market requirements evolve across the plan period (Higgins Group, Hill Residential Limited)
- Need to justify requiring 100% of all new homes to be accessible and adaptable as it is not currently a requirement and if it does become a requirement, it does not need to be included in policy (Home Builders Federation, Dandara, Bellway)
- The requirement for 100% accessible and adaptable homes should only apply to houses and ground floor flats (Chelmer Housing)
- Set a requirement that a percentage of market homes are wheelchair accessible (Mid and South Essex Integrated Care Board)
- Specify M4(3)b to ensure the wheelchair housing is provided with adaptations already in place on completion (Chelmer Housing)
- The Specialist Residential Accommodation and self-build requirements should not apply to 100% affordable housing or affordable-led development and sites should be allocated to meet these needs rather than a requirement on strategic sites (Chelmer Housing)



- The changes to Table 4 in terms of specifying a range, not a specific percentage mix, of housing is supported but flexibility should be increased to 10 percentiles and include a link to the most recent evidence base (Dandara)
- Include Table 4 in the policy to ensure it is adhered to (Dandara PO24-9372)
- Include additional policy text to enable a flexible approach to the mix in Table 4 (Higgins Group, Hill Residential Limited, Dominus Chelmsford Limited)
- Need a clearer distinction between greenfield strategic allocations and urban developments on the requirement for and provision of housing mix, Specialist Residential Accommodation and self-build homes (Dominus Chelmsford Limited)
- Flawed assumptions underpin the Council's viability assessment and the evidence for conclusions in para. 8.6 on the viability of Build to Rent schemes is unsound (Dominus Chelmsford Limited)
- Proposal for a different mix of affordable housing expressed as a percentage range that should apply to all affordable housing tenures (Chelmer Housing)
- Explain the policy thresholds in supporting text (Whirlledge & Nott, Croudace)
- Include a co-living policy to avoid potential appeals or unregulated forms of co-living. Wording for a dedicated policy provided (Highgate Capital Limited)
- Include reference to the Nationally Designed Space Standards or greater (Chelmer Housing).

## DM2 - Affordable Housing and Exception Sites

Summary of Representations – main issues and suggested changes:

- Support policy as drafted (Wates Developments and Hammonds Estates LLP)
- Support but amend to allow for the submission of a Viability Appraisal at application stage should there be any unique circumstances or changes to local market conditions (Bloor Homes (Eastern))
- Support but add to A) i that this is subject to viability to not undermine deliverability (Vistry Group)
- Support but unclear why community-led exception sites cannot include neighbourhood plan allocations (Broomfield Parish Council)
- Clarification sought on whether Broomfield is eligible for a Rural Exception Site following the Community Governance Review (Broomfield Parish Council)
- To not impact on the delivery of affordable homes, amend policy to state that First Homes will not be required on 100% affordable, affordable-led and rural exception site developments (Chelmer Housing Partnership)
- For clarification, add to para. 8.23 the requirements in terms of wider types of affordable (Chelmer Housing Partnership)
- To not jeopardise site viability, policy must recognise that a tenure mix in 2024 (at para. 8.23) will unlikely reflect the needs in subsequent years (Obsidian Strategic Asset Management Ltd)
- Policy should only allow 35% market homes to increase the number of genuinely affordable home supported by a return to council house building, suspension of the Right to Buy for 10 years and increased role for co-operative developers

- Policy should recognise that First Homes is not mandatory and no more than a material consideration (Obsidian Strategic Asset Management Ltd)
- Part ii is inconsistent with national policy and should be amended to expect the mix, size, type and cost of housing to have close regard to the most recent evidence on housing needs, such as the Strategic Housing Market Assessment and monitoring data (Home Builders Federation)
- Should be flexibility in the mix set out in para 8.23 especially on percentage discount on First Homes because of the national cap at £250,000 (Home Builders Federation)
- For clarification, amend policy to add where sites deliver 100% affordable schemes the revised mix should be 70% Affordable Rent, and 30% Shared Ownership and that the Local Housing Allowance cap should be removed on affordable rent where the site is delivered as 100% affordable or affordable-led development (Chelmer Housing Partnership)
- Table 5 should apply across all affordable tenures. Request that the affordable housing unit mix (including rent and shared ownership) is 1 Bed 5-10% 2 Bed 20-25% 3 Bed 40-50% 4 Bed 15-20% (Chelmer Housing Partnership)
- Clarify detail in Table 5 and that it is only to be used as a guide as opposed to absolute requirements in decision-making (Hill Residential Ltd, Higgins Group, Dandara)
- To ensure adherence with Table 5, add into the policy alongside a reference to using the most recent housing needs assessment (Dandara)
- A one-sized fits all 35% requirement discourages a brownfield first approach (Dominus Chelmsford Limited)
- Include reference to the national policy of Vacant Building Credit (Dominus Chelmsford Limited)
- To help the NHS recruit and retain staff, consider the need for affordable housing for NHS staff and those employed by other health and care providers in housing needs assessments, site selection and allocation policies (NHS Property Services Ltd)
- Amend to allow groups of affordable housing within large strategic allocations/development phases (rather than 'pepper potting') as this would achieve the policy's social objectives (Whirlledge & Nott, Croudace Homes)
- Do not support. Amend policy to enable a viability case to be made at the planning application stage (Croudace Homes, Whirlledge & Nott)
- Do not support. Amend policy to allow a transparent open book viability assessment to be undertaken and for development to come forward with an alternative approach to affordable housing delivery should site-specific viability matters arise at the planning application stage (Martin Grant Homes)
- Do not support. The Viability study should be re-run for sheltered and extra care housing incorporating our revised assumptions relating to for example, unit size, unit mix and non-chargeable/communal. This is likely to show that sheltered and extra care housing is unviable (McCarthy Stone)
- Consider the Retirement Housing Consortium paper 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 ('RHG Briefing Note')) (McCarthy Stone)
- An unprecedented housing crisis is currently affecting the Council, therefore a new policy DM2 Part C is proposed, which would supersede DM2 Parts A and B and come into force when more than 250 households are living in

temporary accommodation, and it has been accepted by the Council that there is a duty to house them (Omtech Services Limited).

### Policy DM3 – Gypsy, Traveller and Travelling Showpeople Sites

Summary of Representations – main issues and suggested changes:

- Support (Wates Developments and Hammonds Estates LLP, Writtle Parish Council)
- Add ‘Green Wedge’ in (A)i to align with para. 8.42 (Broomfield Parish Council).

### Securing Economic Growth

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Policy DM4 – Employment Areas and Rural Employment Areas	7	0	8	8
Policy DM5 – Designated Centres	2	0	3	3

### Policy DM4 – Employment Areas and Rural Employment Areas

Summary of Representations – main issues and suggested changes:

- Support for the policy (CNG Fuels Ltd, JH Farming Ltd, Pigeon Sandon Ltd, Wates Developments and Hammonds Estates LLP, Essex County Council)
- Expand policy criteria for allow redevelopment or changes of use from E(g), B2 and B8 Use Classes to uses which provide low carbon/renewable energy transport refuelling infrastructure” (CNG Fuels Ltd)
- Add additional text into para. 3 of the policy for proposals to consider opportunities to promote multifunctional green infrastructure (Essex County Council)
- Support for the approach but new allocations may not, per se, lead to overall economic growth if they lead to older premises becoming less attractive and lost through change of use (Basildon Borough Council)
- Amend to strengthen the policy for example, make it clearer that the redevelopment of existing employment areas should be for employment uses only and planning permission would only be granted for a change of use from employment where the first four criteria apply, and/or there is no reasonable prospect for the site to continue in those uses (Basildon Borough Council).

## Policy DM5 – Designated Centres

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Dominus)
- Car parking at South Woodham Ferrers must be protected if the town centre is to flourish.

## Protecting the Countryside

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Policy DM6 – New Development in the Green Belt	2	0	6	6
Policy DM7 – New Buildings and Structures in the Green Wedge	7	1	14	14
Policy DM8 – New Buildings and Structures in the Rural Area	2	2	4	4
Policy DM9 – Infilling in the Green Belt, Green Wedge and Rural Area	1	0	4	4
Policy DM10 – Change of Use (Land and Buildings) and Engineering Operations	1	0	4	4
Policy DM11 – Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area	1	0	4	4
Policy DM12 – Rural and Agricultural/Forestry Workers' Dwellings	1	0	3	3

## Policy DM6 – New Development in the Green Belt

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, and Wates Developments and Hammonds Estates LLP)
- Alter Green Wedge boundary and extend the western boundary of Widford Employment Area (Map 3) to support growth in this sustainable location, with existing transport and pedestrian links (Saxtons 4x4)

- Policy contradicts the strategy of resisting development in the Green Belt and contradicts the Settlement Hierarchy which confirms that settlements within the Green Belt are sustainable (Hill Residential Ltd and Higgins Group)
- Policy lacks clarity and fails to link to the strategic policies (Hill Residential Ltd and Higgins Group).

#### Policy DM7 – New Buildings and Structures in the Green Wedge

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, and Wates Developments and Hammonds Estates LLP, Broomfield Parish Council)
- An alteration to the Green Wedge boundary should be considered and an extension to Widford Employment Area (Map 3) allowed (Saxtons 4x4)
- For consistency with other parts of the plan refer to 'active and sustainable travel' in criteria v (Essex County Council)
- In terms of C) replacement buildings within a floodplain, there is opportunity to seek betterment and long-term sustainability even if the flood hazard affecting existing development may not increase, this should be clarified in the policy (Environment Agency)
- Policy is overly restrictive without a detailed assessment to ensure land within the Green Wedge performs its intended purposes
- Be more flexible to residential development, particularly where it would provide opportunities to enhance the Green Wedge
- Supports the intentions behind the principle of the Green Wedge but questions the approach to the Green Wedge, when other less onerous planning policies can protect open countryside if the housing strategy is performing as it should (Obsidian Strategic Asset Management Ltd)
- Various comments from landowners/developers promoting their sites for development in the Green Wedge
- Expand policy to include small-scale commercial development that is sustainably located, accessible and well connected (Cliffords Group Ltd and Hill Farm (Chelmsford) Ltd).

#### Policy DM8 – New Buildings and Structures in the Rural Area

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, and Wates Developments and Hammonds Estates LLP)
- Part B should be more flexible (Mr Parker)
- Address inconsistencies regarding allowing new Buildings/Dwellings on Previously Developed Land (Mr Parker)
- Amend to refer to renewable energy and low carbon development, related transport infrastructure and specific locational requirements of different sectors to support the rural economy (CNG Fuels).

### Policy DM9 – Infilling in the Green Belt, Green Wedge and Rural Area

Summary of Representations – main issues and suggested changes:

- Support expressed (Wates Developments and Hammonds Estates LLP)
- Policy needs to mention flood risk constraints (Environment Agency)
- Overly restrictive to development in the Green Wedge
- Unclear how a decision-maker will determine if a gap is ‘small’ and is contrary to the NPPF.

### Policy DM10 – Change of Use (Land and Buildings) and Engineering Operations

Summary of Representations – main issues and suggested changes:

- Support expressed (Wates Developments and Hammonds Estates LLP)
- Policy needs to mention flood risk constraints (Environment Agency)
- Refer to Policy S8 of the Essex Minerals Local Plan and emphasise the importance of effective early engagement with relevant site promoters (Essex County Council).

### Policy DM11 – Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area

Summary of Representations – main issues and suggested changes:

- Support expressed (Wates Developments and Hammonds Estates LLP)
- Policy needs to mention flood risk constraints (Environment Agency)
- Refer to Policy S8 of the Essex Minerals Local Plan and emphasise the importance of effective early engagement with relevant site promoters (Essex County Council).

### Policy DM12 – Rural and Agricultural/Forestry Workers’ Dwellings

Summary of Representations – main issues and suggested changes:

- Support expressed (Wates Developments and Hammonds Estates LLP)
- Policy needs to mention flood risk constraints (Environment Agency)
- Refer to Policy S8 of the Essex Minerals Local Plan and emphasise the importance of effective early engagement with relevant site promoters (Essex County Council).

### Protecting the Historic Environment

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Policy DM13 – Designated Heritage Assets	3	0	3	3

Policy DM14 – Non-Designated Heritage Assets	2	0	2	2
Policy DM15 - Archaeology	0	1	2	2

### Policy DM13 – Designated Heritage Assets

Summary of Representations – main issues and suggested changes:

- Support expressed (C J H Farming Ltd, Pigeon (Sandon) Ltd, Historic England).

### Policy DM14 – Non-Designated Heritage Assets

Summary of Representations – main issues and suggested changes:

- Support expressed (Historic England, Writtle Parish Council).

### Policy DM15 – Archaeology

Summary of Representations – main issues and suggested changes:

- Support expressed (Historic England)
- To reflect para. 8.128 and national policy, re-word the policy to recognise instances where the level of significance of the remains do not warrant protection, preservation or enhancement, and their loss could be justified. New policy text is proposed (Wates Developments and Hammonds Estates LLP).

### Protecting the Natural Environment

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Policy DM16 – Protection and Promotion of Ecology, Nature and Biodiversity	16	6	32	32
Policy DM17 – Trees, Woodland and Landscape Features	5	5	14	14
Policy DM18 – Flooding/SUDS	4	1	12	12
Policy DM19 – Renewable and Low Carbon Energy	2	1	6	6

## Policy DM16 – Protection and Promotion of Ecology, Nature and Biodiversity

### Summary of Representations – main issues and suggested changes:

- Support policy (Wates Developments and Hammonds Estates LLP, Dominus Chelmsford Limited, Natural England, (Pigeon (Sandon) Ltd, Chelmsford and Central Essex RSPB, Anglian Water)
- Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites (Natural England)
- Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protection Areas) and Ramsar sites should be included on the Policies Map (Natural England)
- Reference to swift boxes and bricks is welcome but there is no indication which is preferable – policy change suggested to require swift bricks in accordance with best practice (Swifts Local Network: Swifts & Planning Group)
- Minor policy changes suggested relating to green infrastructure and reference to Essex Green Infrastructure Standards 2022 (Essex County Council)
- Would like to see a distinction between public green spaces and habitats for wildlife as it is not explicitly clarified (Environment Agency)
- Specify that native species should always be used for biodiversity landscaping/planting (Environment Agency)
- Plan makes no explicit preference to retaining riparian corridors as public open space over private gardens (Environment Agency)
- Add a link to the Essex LNRS in the policy (Anglian Water)
- Oppose the 20% BNG requirement on Garden Community sites as it exceeds national requirements (Bellway Homes, Bellway Strategic Land, Chelmsford Garden Community Consortium)
- No assessment of the cumulative impact of the 20% BNG requirement and the tree planting requirement (3 trees per dwelling) (Bellway Homes, Bellway Strategic Land)
- 20% BNG would undermine viability and significantly reduce the capacity of development sites which will impact the Council's growth requirements (Bellway Homes, Bellway Strategic Land)
- The viability impacts of the costs related to BNG habitat management and BNG credits has not been appropriately assessed. The Biodiversity Net Gain and Local Nature Recovery Strategies – Impact Assessment (BNG IA) is based on broad costs, not specific development sites and does not have up-to-date or realistic estimate costs (Dandara Eastern, Home Builders Federation)
- BNG IA makes no consideration to a potential reduction in the developable area to accommodate BNG provision – this assumption should be tested (Home Builders Federation)
- BNG IA underestimates the cost of delivery BNG off-site (Bellway Homes, Home Builders Federation)



- For typology testing, undertake sensitivity testing to understand the impacts of delivering BNG off-site (Home Builders Federation)
- Amend policy to clarify that developers would not be required to meet standards beyond national and local policy (Home Builders Federation)
- Concerns on the deliverability of providing 20% minimum on large sites, which are usually greenfield, as they usually have a relatively high BNG baseline value (Whirledge & Nott, Croudace Homes)
- The 20% biodiversity net gain requirement on large sites has not been justified in evidence base as being financially viable or practically deliverable/viable (Whirledge & Nott, Croudace Homes)
- The viability of delivery 20% BNG need to be tested locally and on current market prices (Chelmsford Garden Community Consortium, Vistry Group)
- 20% BNG should be expressed as a target/aspiration rather than a requirement (Whirledge & Nott, Croudace Homes, Chelmsford Garden Community Consortium, Vistry Group)
- No evidence demonstrating the implications of what a 20% (BNG) uplift would require and whether the proposed allocations can achieve this in comparison to omitted sites that have a stronger BNG potential (Obsidian Strategic Asset Management Ltd)
- More sites will be needed to deliver the Local Plan housing requirement as 20% BNG will reduce developable areas resulting in lower yield of dwellings on sites. Further work is needed with site promoters to identify sites (Obsidian Strategic Asset Management Ltd)
- Policy repeats the BNG requirements of Strategic Policy S4 and national policy – the policy should avoid unnecessary repetition/it is an unnecessary duplication and remove references to the amount of BNG requirement (Dandara Eastern, Hill Residential Ltd, Higgins Homes)
- The requirement for Garden Communities to deliver 20% BNG should be clarified in terms of when it is delivered, i.e. per phase or on completion (Chelmsford Garden Community Consortium, Vistry Group)
- For Garden Communities the policy should require 10% BNG per phase with an aspiration of 20% overall net gain (Chelmsford Garden Community Consortium, Vistry Group)
- Policy should be flexible to take account of; site specific circumstances which may require off-site provision, the viability considerations of off-site vs. on-site and circumstances where off-site provision outside of the administrative may deliver substantial benefits (Chelmsford Garden Community Consortium, Vistry Group).

#### Policy DM17 – Trees, Woodland and Landscape Features

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, Swifts Local Network: Swifts & Planning Group, Dandara, Pigeon (Sandon) Ltd)

- Add to reasoned justification the contribution to the Big Green Internet Project that aims to connect woodlands from Tendring via Chelmsford to Epping Forest (Essex County Council)
- Add reference to Ancient Woodlands and how they are irreplaceable habitats. As such, the policy requirement for replacement of trees of a “size and type suitable for location” may not be entirely appropriate (Forestry Commission)
- New development should consider any impacts on ancient woodland and ancient and veteran trees in line with the NPPF. Support for the Forestry Commissions conclusions (Natural England)
- Clarify the term ‘preserved trees’ and expand policy to include the strict protection of irreplaceable habitats (including ancient or veteran trees and ancient woodlands) as afforded by the NPPF (Wates Development and Hammonds Estates LLP)
- Amend policy to ensure existing nest sites for building-dependent species such as swifts and house martins are protected. Alternatively, mitigation should be provided (Swifts Local Network: Swifts & Planning Group)
- Part C – New Trees is supported but additional wording sought for Part C to ensure new tree planting is adequate (Wates Development and Hammonds Estates LLP)
- The requirements of Part C of three new trees per dwelling is questioned by a number of developers as:
  - prioritising trees in the landscaping and layout may impact negatively on the design of a scheme (Dandara)
  - quality of trees, specimen type and location best dictate tree coverage rather than a stringent quantum. For the Meadows, this would lead to over 2,400 trees which cannot be realistically accommodated (Dominus Chelmsford Ltd)
  - it may impact on viability and should be fully evidenced and considered along with the requirements for BNG (Obsidian Strategic Asset Management Ltd, Richborough, McCarthy and Stones)
- To avoid ambiguity, clarify ‘significant’ with regards the number of trees to be delivered on strategic employment sites (Pigeon (Sandon) Ltd, CNG Fuels).

#### Policy DM18 – Flooding/SUDS

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, Wates Developments and Hammonds Estates LLP, Dominus Chelmsford Limited)
- Policy should not prohibit appropriate land uses such as open space or attenuation measures being in flood zones (Pigeon (Sandon) Ltd)
- Add ‘unless it is demonstrated to be unviable’ in relation to use of SuDS under Part C to ensure development viability is not undermined (CNG Fuels Ltd)
- Support the use of SuDS schemes where appropriate to support aquifer recharge and reduce flooding. However, use of infiltration SuDS is not appropriate on all sites. Recommend guidance be referenced: The Environment Agency's Approach to Groundwater Protection, particularly

statements G1 and G9 to G13; The CIRIA C753 SUDS Manual; The Susdrain website; The Sustainable Drainage Systems: Non-Statutory Technical Standards guidance on gov.uk and the Recommendations To Update (Environment Agency)

- Support the inclusion of SuDS into sites that may come forward for redevelopment and regeneration where such features would also be beneficial for the management of surface water flooding and environmental enhancement (Environment Agency)
- The policy should include: 'B) provide a safe dry refuge above the 01% (1 in 1000) AEP with allowance for climate change' and 'safeguarding land from development that is required, or likely to be required, for current or future flood management' (Environment Agency)
- Amend part B) ii) to clarify that brownfield sites will be treated as greenfield with discharge rates limited to the equivalent 1 in 1 year greenfield rate unless this is demonstrated as not practical (Anglian Water Services Ltd)
- Agree that opportunities for providing betterment should be explored on strategic and regeneration sites, and through retrofitting SuDS within existing urban areas at risk of surface water flooding (Anglian Water Services Ltd)
- Add reference to integrated water management measures such as rainwater/stormwater harvesting and reuse, to minimise potable water demands through utilising non-potable water for irrigation, and flushing toilets in residential properties (Anglian Water Services Ltd)
- Final paragraph of the policy is inadequate to address surface water connections to the public sewer network and amended wording suggested to reflect discharge of surface water following the sustainable drainage hierarchy (Anglian Water Services Ltd)
- Policy needs to have flexibility in approach and allow different techniques to address site specific characteristics. Integrate reference to the Lead Local Flood Authority into the policy (Higgins Group, Hill Residential Ltd)
- Amend section C to provide more consideration to the use of Green Infrastructure SuDS together to maximise benefits through multifunctionality (Essex County Council)
- Comment from landowners/developer suggesting that their proposed development site will accord with the preferred plan (Dandara).

#### Policy DM19 – Renewable and Low Carbon Energy

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, Wates Developments and Hammonds Estates LLP, CNG Fuels)
- Policy should encourage biodiversity, not just impact on it, for example by the establishment of hedgerows and buffer strips (Chelmsford & Central Essex RSPB Local Group, Essex County Council)
- Para 8.163 should refer to the EDG – Solar Farm Guiding Principles (Essex County Council)

- Make the policy and supporting paragraphs more explicit at acknowledging evolving technological carbon reduction advances such as BIO-CNG fuel for the transport sector (CNG Fuels).

### Delivering and protecting Community Facilities

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
DM20 – Delivering Community Facilities	3	1	6	6
DM21- Protecting Community Facilities	3	2	5	5
DM22 – Education Establishments	1	1	2	2

### DM20 – Delivering Community Facilities

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Dandara, Sport England)
- There should be sufficient provision of cemetery space (Environment Agency)
- Refer in policy to vehicle parking being standards in accordance with Policy DM27 (Essex County Council)
- The policy of protecting the Green Belt is leading to other social and economic issues within some Green Belt settlements such as a decline in community infrastructure (Barratt David Wilson (Eastern Counties)).

### DM21 – Protecting Community Facilities

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Sport England)
- Support the need for applicants to provide evidence for the change of use of a public house, particularly focusing on the pub's economic viability and importance to the local community (Chelmsford & Mid Essex CAMRA)
- Support policy premise amend to make it more effective and robust in relation to the use of the term 'economically viable' as viability can be manipulated through intentionally undermining performance. A facility could be successful under an alternative operating model such as community ownership (Theatres Trust)
- Support for the provision of sufficient, quality community facilities but the policy is not flexible enough. The disposal of no longer suitable or redundant healthcare sites and properties helps to fund new or improved services.

Having to meet criterion (ii) adds unjustified delay to vital reinvestment in facilities and services for the community (NHS Property Services Ltd)

- The Spatial Principles do not consider the need for sustainable new housing in Green Belt settlements to sustain their vitality and support existing community infrastructure and services (Barratt David Wilson (Eastern Counties)).

## DM22 – Education Establishments

Summary of Representations – Main Issues:

- Support as drafted (Wates Developments and Hammonds Estates LLP)
- Support principle of policy but delete requirement for expansion proposals to be considered against an approved masterplan as education priorities date quickly requiring frequent costly masterplan updates. Instead assess development proposals against prevailing plan policies (ARU).

## Making High Quality Places

This section of the consultation document provides the basis for the promotion of Chelmsford as a high-quality place to live, work, visit and study in.

### Section 9 - Making Places

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Policy DM23 – High Quality and Inclusive Design	4	1	10	10
Policy DM24 – Design and Place Shaping Principles in Major Developments	6	1	9	9
Policy DM25 – Sustainable Buildings	9	2	19	19
Policy DM31 – Net Zero Carbon Development (In Operation)	8	7	29	29
Policy DM26 – Design Specification for Dwellings	3	0	3	3
Policy DM27 – Parking Standards	1	0	1	1
Policy DM28 – Tall Buildings	2	0	4	4

### Policy DM23 – High Quality and Inclusive Design

Summary of Representations – main issues and suggested changes:

- Overall support (Wates Developments and Hammonds Estates LLP, Hill Residential Ltd, Dominus Chelmsford Limited)

- Policies DM23 and DM24 appear to overlap especially in respect of major developments (Dandara)
- Expand policy to take a comprehensive and co-ordinated approach to development including respecting site constraints and utilities situated within sites (National Grid Electricity Transmission, National Grid Gas Transmission)
- A number of further design criteria are suggested to minimise fire risk and spread of fire, ensure safe access, and reduce risks to water sources (Essex County Fire and Rescue Service)
- Design should be flexible and not be over prescriptive and limiting, to account for changes in building techniques, market expectations, viability and best practice (Higgins Group)
- The cross reference to Policy DM25 is not necessary (Vistry Group)
- Clarify the supporting text to avoid contradiction with main part of policy (CNG Fuels Limited).

#### Policy DM24 – Design and Place Shaping Principles in Major Developments:

Summary of Representations – main issues and suggested changes:

- Overall support for the policy (Wates Developments and Hammonds Estates LLP, Dominus Chelmsford Limited, Chelmsford & Central Essex RSPB Local Group); and in particular the reference to Sport England’s Active Design Guidance (Sport England)
- Residential institutions (Class C2) should also be subject to Health Impact Assessment and to seek Livewell Accreditation (Essex County Council)
- Swift bricks should be required in accordance with best practice (Swifts Local Network: Swifts & Planning Group)
- Design codes would not be sufficiently flexible to respond to specific circumstances (CNG Fuels)
- Further definition of the circumstances where design codes would be expected would help to clarify whether both a design code and a masterplan would be required (CJH Farming, Pigeon (Sandon) Ltd).

#### Policy DM25 – Sustainable Buildings

Summary of Representations – main issues and suggested changes:

- Overall support for the policy (Wates Developments and Hammonds Estates LLP, Chelmsford & Central Essex RSPB Local Group, CJH Farming, Pigeon (Sandon) Limited, Dominus Chelmsford Limited)
- Support the principle for a water efficiency target, but recommend a more ambitious standard of 80-100 litre/person/day (Essex County Council); 100 litre/person/day as a minimum using a fittings based approach (Anglian Water Services)
- Support for rainwater harvesting (Essex County Council, Anglian Water Services)
- SuDS can be utilised to minimise overall water use (Anglian Water Services)
- Support for development having regard to the Essex Parking Guidance, and the Electric vehicle Charge Point Strategy (Essex County Council)

- Swift bricks should be required in accordance with best practice (Swifts Local Network: Swifts & Planning Group)
- Concern at the introduction of requirements in S2, DM31 and DM25 that go beyond Building Regulations, which may impact viability and deliverability of residential development (Hopkins Homes Ltd, Dandara, Whirlledge and Nott, Croudace Homes) and become out of date as standards evolve (Boyer Planning)
- Provision for electric vehicle charging is covered by Building Regulations so should not be duplicated (Hopkins Homes Ltd, Home Builders Federation, Dandara); or the policy should set out where requirements go beyond Building Regulations (Chelmsford Garden Community Consortium, Vistry Group)
- Include a threshold for provision of public EV charging points, which may not be a reasonable requirement on smaller sites (Whirlledge and Nott, Croudace Homes)
- Water efficiency targets are covered by Building Regulations, and the policy does not allow for flexibility and therefore is likely to become out of date quickly (Dandara, Hill Residential Ltd)
- Policy should recommend rather than require rainwater harvesting and be limited to garden irrigation (Chelmsford Garden Community Consortium, Vistry Group)
- The threshold for BREEAM assessment should be raised to 1,000sqm, less is unlikely to lead to enhanced sustainable design (Chelmsford Garden Community Consortium, Vistry Group).

#### Policy DM31 – Net Zero Carbon Development (In Operation)

Summary of Representations – main issues and suggested changes:

- Fully support the policy (Wates Developments and Hammonds Estates LLP, Dominus Chelmsford Limited, Obsidian Strategic Asset Management Ltd, Essex County Council)
- Supportive of the need to support net zero carbon development and the principles of what the policy is seeking to achieve (ARU, Chelmsford & Central Essex RSPB Local Group, Dandara, Vistry Group, Chelmsford Garden Community Consortium)
- Striving to achieve net-zero carbon homes at a faster rate than the Council's and the UK Government's target of net zero carbon emissions is commendable (McCarthy Stone, Gleeson Land)
- Support the principle of energy efficient and sustainable buildings but this should be in line with Building Regulations (Richborough, Home Builders Federation)
- Going beyond Building Regulations goes against the written Ministerial Statements, the NPPF and Planning Policy Guidance (McCarthy Stone, Croudace Homes, Whirlledge & Nott, Home Builders Federation)
- Any over provision of Building Regulations should be advisory or supportive, rather than a policy requirement (Richborough)

- The impact of this policy on the viability and deliverability of residential development has not been considered in the plan, its evidence base, or by the IIA (Hopkins Homes Ltd, Home Builders Federation)
- The policy should be amended to provide flexibility with regard to achieving Net Zero Carbon depending on viability (Gleeson Land, Dandara, Croudace Homes, Whirlledge & Nott, Higgins Group)
- Exceeding national requirements and setting local standards provide inconsistency across the country, hampering investment and has the potential to impact upon viability and the delivery of housing in the area (Richborough, Vistry Group, Chelmsford Garden Community Consortium, Gladman, Higgins Group, Hill Residential Ltd)
- For the policy to be flexible and justified over the plan period, the requirements need to better reflect the Building Regulations requirements and allow applicants to take a combined approach subject to each individual site (Hill Residential Ltd)
- The implications of such a policy have not been properly assessed in the supporting evidence base (Home Builders Federation)
- The Local Plan Viability Study should be updated to reflect the costs identified in Report 1 of the Essex Net Zero Policy Study – Technical Evidence (Essex County Council)
- The size threshold for requirements 1-5 to apply is too low (ARU)
- Requirement 2: Future Homes Standard will ensure all new homes to be zero carbon ready so it is unnecessary to include this as it will already be addressed through building regulations by the time the local plan review is adopted (Home Builders Federation)
- Supports the policy and the securing of financial contributions where on-site carbon mitigation requirements cannot be met. NHS property could benefit from carbon offset funds (NHS Property Services Ltd)
- Requirement 4: On-site renewable energy generation needs to be applied flexibly. The level of energy use from unregulated sources is beyond the control of the developer and as such it is unreasonable to require the developer to make a payment in order offset use from these sources (Pigeon (Sandon) Ltd, Higgins Group, Hill Residential Ltd, Home Builders Federation)
- The use of solar PV is a key contributor to achieving Net Zero, but other technologies and approaches may be more suitable for various developments and there needs to be flexibility to deliver what is necessary for the site (Hill Residential Ltd, ARU)
- Requirement 5: Monitoring development for the first five years is beyond the scope of what local planning authorities can require of a developer. Energy use will depend significantly on the occupant and how they use it (Home Builders Federation)
- Suggest amendments to Table 7 to improve clarity, which will be reflected in a revised Essex 'model policy' document to support the policy (Essex County Council)
- Applying this policy retrospectively to allocations within the adopted Local Plan would impact their viability and deliverability (Hopkins Homes Ltd)



- Relying solely on renewable fuel provided on sites is too greater risk. A "safety net" of mains electricity from the grid should be available in case the installation, designs or calculations fall short of expectations (Chelmsford & Central Essex RSPB Local Group)
- Other local authorities are mentioning the use of sustainable building materials (such as the use of home grown timber) in their new local plans (Forestry Commission England)
- Consider developing the points raised on overheating in the Reasoned Justification into a specific plan policy to give greater weight to mitigating overheating risk in new development proposals (Essex County Council)
- The new Essex evidence-led 'model policy' to address embodied carbon emissions from new development, and its supporting evidence base, should be included as an additional policy (Essex County Council).

#### Policy DM26 – Design Specification for Dwellings

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP)
- Swift bricks should be required in accordance with best practice (Swifts Local Network: Swifts & Planning Group)
- Support expressed for the overall policy objective, but further clarification on the Council's open space requirements and private amenity spaces would be helpful in this policy wording (Vistry Group).

#### Policy DM27 – Parking Standards

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP).

#### Policy DM28 – Tall Buildings

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Historic England)
- More clarification is needed on how a site is assessed for its suitability for higher intensity development (Highgate Capital Limited)
- Add additional wording to include other locations that are well served by public transport (Vistry Group).

## Protecting Living and Working Environments

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Policy DM29 – Protecting Living and Working Environments	1		1	1
Policy DM30 – Contamination and Pollution	2		3	3

### Policy DM29 – Protecting Living and Working Environments

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP).

### Policy DM30 – Contamination and Pollution

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Chelmsford & Central Essex RSPB Local Group)
- Re-development of land affected by contamination is encouraged as it is a sustainable approach (Environment Agency).

## **Monitoring Framework**

This section of the consultation document deals with how the Council will monitor the Local Plan's success in meeting the challenges and opportunities set out in the Strategic Priorities to ensure that it is effective in delivering the objectives of the Local Plan.

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Table 8	0	0	1	1

Summary of Representations – main issues and suggested changes:

- S14 Page 326 - Amend 'Key Trigger' to read: 'Number of Health Impact Assessments on development for 50 or more dwelling, C2 (Residential Institutions) and non-residential development in excess of 1,000 m<sup>2</sup>' and 'Trigger for Action' to read: '(1) Health Impact Assessment is not submitted on one or more development for 50 or more dwellings, one or more C2 (Residential Institutions) and one or more non-residential development in excess of 1000 m<sup>2</sup>' (Essex County Council)

- S14 Page 326 - Consider if reference should be made to 'initial assessments' (Essex County Council)
- S14 Page 326 - Provide further clarification on the process and details for 'an initial assessment' for developments for example, desktop, rapid and full/comprehensive (Essex County Council)
- S14 Page 326 - Consider an additional indicator that captures how HIA's are effectively and positively influencing proposals and achieving what they are set out to do (Essex County Council).

### **Draft Policies Map**

This section of the consultation document sets out the Draft Policies Map which illustrate sites for development or protection within the Local Plan.

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Draft Policies Map (Paragraphs 11.1-11.3)	1	4	5	5
Map 3 – Chelmsford Urban Area	1	4	5	5
Map 5 – South Woodham Ferrers	0	0	1	1
Map 8 - Bicknacre	0	2	2	2
Map 11 – Chatham Green	0	1	1	1
Map 12 - Danbury	0	1	1	1
Map 16 - Galleywood	0	0	1	1
Map 23 – Little Waltham	0	1	1	1
<b>Rural Employment Areas</b>				
None	0	0	0	0
<b>Other Maps</b>				
None	0	0	0	0
Legend	0	0	0	0

### **Chelmsford Urban Area (Map 3)**

Summary of Representations – main issues and suggested changes:

- Revise Chelmsford Urban Area to include areas of development and land east and south of the A12 (along Main Road and Paynes Lane, Boreham) (Aquila Developments, CNG Fuels)
- Revise to allocate Chantry Farm, Waltham Road, Boreham for Specialist Housing for the elderly (Mark Jackson Planning)
- SGS16a (Hammonds Farm) - Exclude land north of the River Chelmer from the Country Park and site boundary and retain in agricultural use, add the indicative route for the access route to Junction 19, and reduce the eastern development boundary to exclude land in Flood Zones 2 and 3 adjacent to Sandon Brook (Wates Developments and Hammonds Estates LLP)

- Allocate land at north west Chelmsford, north of the existing settlement boundary (Dandara Eastern)
- Allocate land north of Runsell Lane to help meet local housing needs whilst minimising harm and protecting the purposes of the Green Belt (Obsidian Strategic)
- Expand Widford Industrial Estate to the west to support Saxtons 4x4 and to better align with the Spatial Strategy (Saxtons 4x4)
- Expand Growth Site 15 to include further land to the west to reflect the full extent of the deliverable site (CLH Farming Ltd).

#### South Woodham Ferrers (Map 5)

Summary of Representations – main issues and suggested changes:

- A dual carriageway on the A132 and a northern bypass on the B1012 are required rather than ‘Route Capacity Improvements’ (Mr Brunning).

#### Bicknacre (Map 8)

Summary of Representations – main issues and suggested changes:

- Revise settlement boundary to include the entire Priory Pet & Country Supplies Store site, Horseshoe Farm to reflect recent planning history (Strutt & Parker)
- Allocate land north of Roxwell Road as an extension to Location 2 – West Chelmsford which performs better when compared against Hammonds Farm (Taylor Wimpey)
- Object to allocation of a new Garden Community at Hammonds Farm which is not deliverable by 2041 or justified by the evidence base Farm (Taylor Wimpey)
- Unclear why the Defined Settlement Boundary cuts through gardens.

#### Chatham Green (Map 11)

Summary of Representations – main issues and suggested changes:

- Increase the settlement boundary to make it more sustainable by including Pondsides Nursery and Yard and allocating it for employment or residential development (Mr and Mrs Andrew Parker).

#### Danbury (Map 12)

Summary of Representations – main issues and suggested changes:

- Allocate land north of Runsell Lane to help meet local housing needs whilst minimising harm and protecting the purposes of the Green Belt (Obsidian Strategic).

### Galleywood (Map 16)

Summary of Representations – main issues and suggested changes:

- The defined settlement boundary has been drawn to exclude any worthwhile housing sites apart from site 4. The plan should be more flexible to allow the growth of Galleywood (Park View Group).

### Little Waltham (Map 23)

Summary of Representations – main issues and suggested changes:

- Remove Green Wedge notation from land between 148 The Street and The Warren, Braintree Road and allocate for housing (Mr Paul Hopkins).

No comments to other maps.

## **Appendices**

This section of the consultation document contains four appendices.

Key statistics:

<b>Consultation point</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
Appendix A – Schedule of Superseded Documents and Policies	0	1	1	1
Appendix B – Development Standards	0	0	0	0
Appendix C – Development Trajectories	0	0	2	2
Appendix D – Glossary	1	1	5	5

### Appendix A – Schedule of Superseded Documents and Policies

Summary of Representations – main issues and suggested changes:

- One comment received which relates to Policy DM2.

### Appendix B – Development Standards:

No comments.

## Appendix C – Development Trajectories

Summary of Representations – main issues and suggested changes:

- It seems highly unlikely that housing sites expected to deliver within the next 12 months will do, so the plan needs to allocate more deliverable smaller sites (Opus Little Waltham Developments Ltd)
- There is no evidence that 3,000 new homes at Hammonds Farm will be completed within the plan period, with a potential further 1,000 homes beyond 2041. Although large sites can deliver more homes per year over a longer time, they also have longer lead-in times. To secure short-term immediate boosts in supply – a good mix of smaller sites is necessary (Taylor Wimpey).

## Appendix D – Glossary

Summary of Representations – main issues and suggested changes:

- Add the following heritage related terms: listed buildings, conservation areas, scheduled monuments, registered parks and gardens and designated and non-designated heritage assets (Historic England)
- Add 'constituted community organisation' referred to in para. 1.43 (Essex County Council)
- Add terms related to specific cohorts for supported and specialist housing and accommodation such as older people and people with a learning disability (Essex County Council)
- Add a definition for Renewable and Low Carbon Energy (CNG Fuels Ltd)
- Add detail relating specifically to police, ambulance and fire and rescue facilities (Essex Police).

## **Appendix 1: Organisations consulted and copies of key consultation materials**

## **APPENDIX 1**

List of organisations consulted

Consultation Statement

Exhibition Panels

Pop-Up Stand

Pop-Up Stand on Site

Local Plan Video

Local Plan Virtual Exhibition

Essex Chronicle Advert

City Life Articles

South Woodham Focus Article

Local Plan Poster

Examples of Social Media Posts

GovDelivery Mailshot

Example Site Notices

Staff Email Banner

Bus Stop Adverts

Local Plan Newsletter



## List of organisations consulted

The Council notified more than 2,800 contacts registered on its Consultation Portal.

This included the specific and general contacts listed below, and members of the public who are not listed.

1st Chelmsford Scouts	Bakers Lane Action Group	Bradwell Power Generation Company Ltd
A Dunn & Son	Barking & Dagenham CCG	Braintree District Council
A.R. Property Designs Ltd.	Barnes Farm Infant School	Brentwood and Chelmsford Green Party
Abbess, Beauchamp & Berners Roding Parish Council	Barnston Parish Council	Brentwood Borough Council
Abellio Greater Anglia	Barratt David Wilson	Bressole Limited
Accord Energy Limited	Barratt Eastern Counties	Bridgewater Property Group Limited
Active Workspace Ltd	Barton Willmore	Broadfield Homes Ltd
Age UK Essex	Basildon & Brentwood CCG	Broomfield Neighbourhood Plan Steering Group
Agency of Architecture	Basildon Borough Council	Broomfield Parish Council
Aggregate Industries UK Ltd	Baya Homes	Broomfield Parish Council, Chignal Parish Council, Great Waltham Parish Council, Little Waltham Parish Council, Writtle Parish Council and Newlands Spring Residents Association
AGS Cemetery and Crematoria Services	BBC Essex	Broomfield Primary School
Aldi Stores Ltd	BDP	BT National Notice Handling Centre
Alun Design Consultancy	Beaulieu Residents	BT Openreach, Southend ATE
Anchor Housing	Belport Limited	Building Research Establishment
Andrew Martin - Planning Ltd	Bennetts BMW Specialists	CAAG
Angel Stores	Berkeley Strategic	Campaign For Real Ale (CAMRA) Limited
Anglia Ruskin University	Bidwells	Campaign to Protect Rural Essex
Anglian Water Services Ltd	Billericay Town Council	CAODS (Chelmsford Amateur Operatic & Dramatic Society)
Aquila Developments	Bishops Primary School	
Arcady Architects	Black Notley Parish Council	
Archerfield Homes	Blackmore, Hook End & Wyatts Green Parish Council	
Arriva The Shires and Essex	Bloor Homes (Eastern)	
ASP	BNP Paribas Real Estate UK	
Atkins Telecom	Boreham Conservation Society	
Avison Young	Boreham Parish Council	
Aviva	Boreham Primary School	
b3 Architects LLP	Bowler Energy LLP	
Baddow Hall Junior School	Boyer Planning	

Capital Property & Construction Consultants Ltd	Chelmsford Canoe Club	CHP
Carter Jonas	Chelmsford City Centre Retailers Group	Chris Marten Architectural Services
Castle Point & Rochford CCG	Chelmsford City Council	Chris Tivey Associates
Castle Point Council	Chelmsford City Football Club	Christian Care
Catton Homes	Chelmsford Civic Society	Christian Growth Centre Chelmsford
CBRE	Chelmsford College	Church of Our Lady Immaculate
Cemex UK Properties Ltd	Chelmsford Community Transport Limited	Churchill Retirement Living
Centrica Barry/ Generation/ KL/ PB/ RPS LTD	Chelmsford Commuters & Rail Travellers	Civil Aviation Authority
CERA (Chignal Estate Residents Association)	Chelmsford County High Schools for Girls	Claremont Planning
Chancellor Park Primary School	Chelmsford CVS	Clark Partnership
Channels Residents Community Group	Chelmsford Cycle Action Group	Clarke & Simpson
Charterhouse Property Group & Charterhouse Strategic Land	Chelmsford Garden Community Council	CODE Development Planners
Chartplan (2004) Limited	Chelmsford Hindu Society	Colchester City Council
Chelmer & Blackwater Navigation Co Ltd	Chelmsford Labour Party	Cold Norton Parish Council
Chelmer Canal Trust	Chelmsford Liberal Democrats	Colliers International
Chelmer Cycling Club	Chelmsford Liberal Party	Collingwood Primary School
Chelmer Housing Partnership	Chelmsford Mencap	Colt Technology Services
Chelmer Residents Forum	Chelmsford NAG	Columbus School & College
Chelmer Valley High School	Chelmsford Rugby Football Club	Commercial Estates Group
Chelmer Valley Landscape Group	Chelmsford Safety Supplies	Company of Proprietors of the Chelmer & Blackwater Navigation Ltd
Chelmer Village Parish Council	Chelmsford Social Club Ltd	Confederation of Passenger Transport UK (Hedingham/Chambers)
Chelmsford & Central Essex RSPB Local Group	Chelmsford Star Co-operative Society Ltd	Connexions & Careers Chelmsford
Chelmsford and District Model Railway Club	Chelmsford Taxi Association Limited	Cool Heat Services
Chelmsford Biodiversity Forum	Chelmsford Theatre Workshop	Corona Energy Retail 4 Ltd
Chelmsford Business Board	CHESS	Countryside L&Q (North East Chelmsford) LLP
	Chignal Estate Residents Association	Countryside Properties (UK) Ltd
	Chignal Parish Council	CPRE Essex
		Craintern Ltd
		Crest Nicholson

Crouch Vale Brewery Ltd	Dominvs Group	Epping Forest District Council
Croudace Homes	Downham CE (VC) Primary School	ERGOTECHNICS
Crown Energy Ltd	DTI	Esperance energies
CSJ Planning Consultants Ltd	DWD Property & Planning	Essex & Suffolk Water
CT Planning	E & M Design	Essex ARG
Cycling UK	E.ON UK Plc	Essex Association of Local Councils
Danbury Mission	E2V Technologies	Essex Biodiversity Project
Danbury Neighbourhood Plan Steering Group	East Anglia GREEN	Essex Bridleways Association
Danbury Parish Council	East Anglia London Properties Ltd	Essex Chamber of Commerce
Danbury Park Community Primary School	East Hanningfield Parish Council	Essex Chronicle
Danbury Society	East Hanningfield Parish Plan Committee	Essex County Council
Dandara	East Herts District Council	Essex County Fire and Rescue Service
Data Energy Management Services Ltd	East of England Ambulance Service NHS Trust	Essex Fire
Defence Infrastructure Organisation (DIO)	East Thames Housing	Essex Herts Air Ambulance Trust
Department for Education	Eastlight Homes	Essex Local Nature Partnership
Department for Levelling Up, Housing and Communities	Ecotricity	Essex Police
Department for Transport (DfT)	EDF Energy	Essex Police Fire and Crime Commissioner
Department of Trade and Industry	Education & Skills Funding Agency	Essex Record Office
Derbyshire Gypsy Liaison Group	Edward Gittins Associates	Essex Respite and Care Association
Design Council	Edward Parsley Associates Ltd	Essex Squash & Racketball Association
detoxpeople ltd	EE	Essex Waterways Ltd
Development Land & Planning Consultants Ltd	Elim Christian Centre	Essex Wildlife Trust
DevPlan UK	Elm Green Preparatory School	Estuary Design Ltd
DHA Planning	Elmwood Primary School	Estuary Housing Association
Diageo Pension Trust Fund	Energy Environment and Sustainability Group	Evolution Town Planning
Diocese of Chelmsford	English Rural Housing Association	Exolum Pipeline System Ltd
DMH Stallard	ENI UK Ltd	Eyott Sailing Club
Dominic Lawson Bespoke Planning Ltd	Enplan	Farleigh Hospice
	Environment Agency	Felsted Parish Council

Fenn Wright	Great Baddow High School	High Easter Parish Council
Fergusons	Great Baddow High School	High Ongar Parish Council
First Choice Residential Lettings	Great Baddow Parish Council	Highways England
First Essex Buses	Great Baddow St Mary	Highwood Parish Council
Fisher German LLP	Great Notley Parish Council	Highwood Primary School
Flagship Housing Group Ltd	Great Waltham C of E (VC) Primary School	Highwood Village
Flaternity Residents association	Great Waltham Parish Council	Hill Residential Ltd
Fritch Green Parish Council	Greater London Authority	Historic England
Football Association	Green Planning Studio Ltd	HLR Consulting Ltd
Ford End Church of England Primary School	Greenfields Community Housing Ltd	Home Builders Federation
Ford End Village Design Statement Committee	Grosvenor Developments Ltd	Homes England
Forestry Commission England	H M Prison Service	Hopkins Homes Ltd
Foster Partnership Farms	Hamilton Bentley & Partners	House Of Commons
Fraser Halls Associates	Harlequin Ltd	Howard Sharp & Partners LLP
Friends, Families and Travellers and Traveller Law Reform Project	Harlow District Council	Howe Green Community Association
G.T.C/Utility Grid Installations	Hastoe Housing Association	Hullbridge Parish Council
Galleywood Infant School	Hatfield Peverel Parish Council	Hunter Page Planning
Galleywood Parish Council	Havering CCG	Hylands School
GB Partnerships	Havering London Borough	Iceland Foods Ltd
Gladman Developments Ltd	Health and Safety Executive	Iceni Projects
Gleeson Land	Heart of Essex Local Enterprise Partnership	Ideas Hub
Going Places Leisure Travel Ltd	Heathcote School	Indigo Planning
Good Easter Parish Council	Heatons	Indigo Planning Ltd
Good Easter Village Hall	Help The Aged	Ingatestone & Fryerning Parish Council
Graham Anthony Associates	Helping Hands Essex	Ingatestone Village Design Statement
Grangewood Brentwood Ltd	Heritage Writtle	Ingleton Wood (Billericay)
Great & Little Leighs Parish Council	Hertfordshire and West Essex ICB	Intergen
Great Baddow Beehive Lane County Primary School	Hertfordshire County Council	J. Aron & Company
	hgh Consulting	Jacobs UK Limited
	Higgins Group	James Development Ltd
		JB Planning Associates Ltd
		JCN Associates Ltd
		JCN Design Ltd

JMS Planning & Development Ltd	London Borough of Enfield	Mid Essex Hospital Services NHS Trust
John H Bayliss & Co	London Borough of Redbridge	Mid Essex Primary Care Trust
Keeble Brothers	London Borough of Waltham Forest	Mid-Essex Business Group
Keeran Designs Ltd	London Gypsies and Travellers Unit	Mildmay Infant and Nursery School
Kemsley LLP	Longfield Solar Farm	MJD Planning
King Edward Grammar School	Lower Thames Crossing	Moat Homes
Kings Hardware Ltd	LSL Partners	Mobile Broadband Network Limited
Kings Road Primary School	Maldon District Council	Mono Consultants Ltd
Kings Road/North Avenue Community Action Group	Maltese Road Primary School	Montagu Evans
KLW Planning	Mansfield Monk Limited	Moody Homes Ltd
KM Consulting	Marconi Plaza Residents Association	Moulsham High School
L&Q	Margaret Roding Parish Council	Moulsham Infant School
Lambert Smith Hampton	Margaretting CE (VC) Primary School	Moulsham Junior School
Landscape Planning Group Ltd (including Landscape Planning & OCA)	Margaretting Parish Council	Moulsham Mill Partnership
Langford and Ulting Parish Council	Marine Management Organisation (MMO) HM Government	Mountnessing Parish Council
Lanpro	Mark Jackson Planning	N Clark Welding & Fabrication
Larkrise Primary School	Marrons Planning	Nabbotts County Infants School
Larmar Engineering	Mashbury Parish Council	Nathaniel Lichfield and Partners
Latimer Homes	Master Designs Essex	National Gas Transmission
Lawford Mead Primary & Nursery School	McDonald's Restaurants	National Grid UK
Lawns Action Group	Meadgate Primary School	National Highways
Little Baddow Parish Council	Meadows Shopping Centre	Natural England
Little Baddow Society	Melville Dunbar Associates	Neos Networks
Little Dunmow Parish Council	Michael Benham Acquisition/Disposal of Land & Property	Network Rail
Little Waltham C E V A Primary School	Mid and South Essex ICS	New Hall School
Little Waltham Parish Council	Mid and South Essex Integrated Care Board (ICB)	Newlands Spring Primary School Academy Trust
Lodge Coaches	Mid Essex Gravel Pits (Chelmsford) Ltd	Newlands Spring Residents Association
London Borough of Barking and Dagenham		Nexus Planning
		NGB Essex Angling

NGB Essex Athletics	Our Lady Immaculate R C Primary School	Ramsden Crays Parish Council
NGB Essex Basketball		
NGB Essex Boccia	Parkway and Town Centre Neighbourhood Action Panel	Rapleys
NGB Essex Bowls	Parkwood Academy	Rawreth Parish Council
NGB Essex Cricket	Paul Dickinson & Associates	Rayleigh Town Council
NGB Essex Cycling	Pegasus Group	Raymond Stemp Associates
NGB Essex Fencing	Perryfields County Infants School	Rayne Parish Council
NGB Essex Football	Perryfields Junior School	RCCE
NGB Essex Gymnastics	Persimmon Homes Essex	Redbridge CCG
NGB Essex Hockey	Phase 2 Planning & Development	Rentplus (Agents Tetlow King Planning)
NGB Essex Lacrosse	Pinnacle Planning	Reprohouse Limited
NGB Essex Movement and Dance	PKC Retail Ltd	Resting Places Limited
NGB Essex Orienteering	Place Services Historic Environment Team	Retail Focus
NGB Essex Rowing	PlanIt Planning and Development Ltd	Rettendon Common Residents Association
NGB Essex Rugby Union	Planning Issues Ltd	Rettendon Parish Council
NGB Essex Sailing	Planning Potential	Rettendon Primary School
NGB Essex Squash	Planware Ltd	Rettendon Site Leaseholders Association
NGB Essex Triathlon	Plater Claiborne Architecture & Design	River Crouch Conservation Trust
NGB Essex Volleyball	Pleshey Parish Council	Road Haulage Association
NHS England East	Pomery Planning Consultants	Robert Brett & Sons Ltd
NHS North East London	Premier Homes	Robinson and Hall
NHS South East and South West Essex	Princes Rd Allotment Association	Rochford District Council
NHS Suffolk and North East Essex ICB	Priory Primary School	Roxwell CoE (VC) Primary School
NIBS Buses	PRS	Roxwell Parish Council
Nigel Chapman Associates	PS Planning & Design	Royal Mail Group
North Central London CCG	Ptarmigan Group and Chelmsford Land Ltd	Royal Society For Protection of Birds
North Essex Partnership NHS Foundation Trust	Ptarmigan Land Ltd	RPS Planning & Development Ltd
North Fambridge Parish Council	Purleigh Parish Council	RSPCA
North West Parishes Group	Ramblers Essex Area	Rubicon West Plc
Northern Trust	Ramsden Bellhouse Parish Council	Rugby Football Union
Oaklands Infants School		Rugbytots Central Essex
Office of Rail Regulation		

Runwell Parish Council	Sport England	Terence O'Rourke Ltd
Rural Community Council of Essex	Springboard Housing Association Ltd	Terling and Fairstead Parish Council
Rural Solutions Ltd	Springfield Parish Council	Tetlow King Planning
Ruston Planning Limited	Springfield Primary School	The Alternative Accommodation Agency Ltd
S A Mynard Limited	Springfields Planning & Development Limited	The Beaulieu Park School
Sandon Parish Council	SSE Pipelines Ltd	The Boswells School
Sandon school	St Anne's Preparatory School	The Cathedral School Chelmsford
Save Sandford Mill Campaign	St Augustine's Catholic Church	The Chelmsford Ballet Company
Savills (UK) Limited	St Cedd's School	The Chelmsford Labour Party
Scott Brownrigg	St John Payne Catholic School	The Chelmsford Society
Scottish & Southern Energy Pipelines	St John's C of E Primary School	The Downes Planning Partnership
Sellwood Planning	St Joseph's Catholic Primary School	The Essex Badger Protection Group
Shirley Smith & Co	St Mary's CE Primary School	The Inland Waterways Association (Chelmsford Branch)
Shotgate Parish Council	St Mary's Church Great Baddow	The John Bishop Partnership
Sky Telecommunication Services Ltd	St Peters Primary School	The JTS Partnership LLP
Smart Planning	St Pius X Catholic Primary School	The Land Trust
Smiths Environmental Products Ltd	St. Michael's Junior School	The Landscape Conservation Trust
South East LEP	Stephenson's of Essex Ltd	The National Federation of Gypsy Liaison Groups
South Hanningfield Parish Council	Stevens VW Dismantlers	The National Trust
South Molton Real Estate Ltd	Stock CE Primary School	The Newspaper Society
South Woodham Action Group	Stock Parish Council	The Owen Partnership
South Woodham Ferrers Health & Social Care Group	Stonebond Properties Ltd	The Planning Bureau
South Woodham Ferrers Town Council	Stow Maries Parish Council	The Royal Horticultural Society
Southend Borough Council	Strutt & Parker LLP	The Sandon School
Southend CCG	Swan Housing Association	The Showmen's Guild of Great Britain
Southern Electric	Sworders	
SP PowerSystems	Tarmac	
SPD Studio	Telecom Plus PLC	
Sphere 25	Tendring District Council	

The Showmen's Guild of Great Britain London and Home Counties	Trinity St Mary's CE (VA) Primary School	Whirledge and Nott
The Tyrells Primary School	Tritton Family Trust	Wickford Town Council
The Wilderness Foundation UK	Turley Associates	Widford Lodge Preparatory School
The Women's National Commission	UK Power Networks	William de Ferrers School
Theatres Trust	Uttlesford District Council	Willingale Parish Council
Third Dimension Group Ltd	Valco UK Ltd	Wilson Construction Ltd
Thomas Dixon Developments Ltd	Village Hall Committee	WM Morrison Supermarket Plc
Three	Virgin Media Services	Women's Institute
Thriftwood School	Vitol Gas Ltd	Woodham Ferrers & Bicknacre Parish Council
Thurrock Borough Council	Vodafone and O2	Woodham Mortimer with Hazeleigh Parish Council
Timpsons	W&H Marriage & Sons Ltd	Woodham Walter Parish Council
TMA Chartered Surveyors	Waitrose Ltd	Woodland Trust
Tolhurst Fisher LLP Solicitors	Wardrop & Co Ltd	Woodville Primary School
Total Gas and Power Ltd	Warwick Court Property Company	Woolf Bond Planning
Transition Chelmsford	Waterhouse Farm Residents Association	Writtle Infant School
Transport East	Wates Developments Limited	Writtle Junior School
Transport for London	WEA Sec	Writtle Neighbourhood Plan Group
Traveller Law Reform Project	Welbeck Strategic Land	Writtle Parish Council
Travelling Showman's Guild	Welsted Joinery Ltd	Writtle Surgery
Tree Fella Plc	West Hanningfield Parish Council	Writtle VDS
Trinity PPP Limited	West Register (Realisations) Ltd	YMCA
Trinity Road Primary School	Westlands Community Primary School	
	WH Marriage & Sons Ltd	



## **REVIEW OF CHELMSFORD LOCAL PLAN**

### **REGULATION 18 – PREFERRED OPTIONS**

Chelmsford City Council has published its Regulation 18 Preferred Options consultation on the Review of its adopted Local Plan. This consultation is accompanied by a Preferred Options Integrated Impact Assessment.

The consultation runs for six weeks from **10am on Wednesday 8 June 2024 until 4pm on Wednesday 19 June 2024.**

#### **Regulation 18 Preferred Options Consultation Document**

This Regulation 18 Preferred Option consultation is the second formal stage in the preparation of the review of the adopted Chelmsford Local Plan, and a further opportunity for residents, businesses, developers, and other interested parties to get involved.

This is a full draft of the reviewed Local Plan. It includes updated and new policies and sets out proposed sites where new homes, employment and other facilities could be located. It also contains policies that we would use to decide planning applications.

#### **Regulation 18 Preferred Options Integrated Impact Assessment (IIA) Consultation Document**

The adopted Local Plan was developed alongside a comprehensive Sustainability Appraisal (SA) and Habitats Regulations Appraisal (HRA) process. For this review process, the Council is including other aspects of sustainable development in an Integrated Impact Assessment (IIA), which covers the following:

- Sustainability Appraisal
- Strategic Environmental Assessment
- Habitats Regulations Assessment
- Health Impact Assessment
- Equality Impact Assessment.

We are consulting on the Integrated Impact Assessment which assesses the Preferred Options against a range of social, environmental and economic indicators.

#### **Broomfield and Danbury Neighbourhood Plans Regulation 16 Consultations**

We are also consulting on two Neighbourhood Plans. These have been developed by Broomfield and Danbury Parish Councils, and cover a wide range of issues such as landscape, transport, recreation, heritage, building design, and business. When they are adopted, both Neighbourhood Plans will become part of the Local Plan and will be used for planning decision making.

Find out more at:

[www.chelmsford.gov.uk/broomfieldplan](http://www.chelmsford.gov.uk/broomfieldplan) and [www.chelmsford.gov.uk/danburyplan](http://www.chelmsford.gov.uk/danburyplan).

## **Where to view the documents and how to make representations:**

### **View and comment online**

You can view and comment on the consultation documents on the City Council's Consultation Portal at: [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult). This is our preferred method to comment.

If you have not used this system before or have any difficulties logging in, please see our guidance notes at: [www.chelmsford.gov.uk/lp-portal-guide](http://www.chelmsford.gov.uk/lp-portal-guide) or call us on (01245) 606330.

### **View in person**

Paper copies can be viewed at the City Council Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE Monday to Friday 10am to 4pm (Please note we are closed on bank holidays).

### **Comment via email**

Comments may be submitted by email: [planning.policy@chelmsford.gov.uk](mailto:planning.policy@chelmsford.gov.uk)  
Please include your name and postal address in your message.

A specially designed response form can be downloaded at [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review) or made available on request by telephoning (01245) 606330 or emailing [planning.policy@chelmsford.gov.uk](mailto:planning.policy@chelmsford.gov.uk).

### **Paper comments**

You can submit your comments by post or deliver them in person in the following ways:

**Post:** Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE

**By hand:** Monday to Friday 10am to 4pm - Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE (outside of these hours you can use the post box outside the Customer Service Centre).

If you do not have access to a computer, you can request paper copies. A charge will be made to cover printing and postage costs.

If you have difficulties making representations by e-mail or post due to a disability, please call us (01245) 606330.

### **How to find out more:**

We will be hosting an online virtual exhibition for the Local Plan Preferred Options Consultation as well as having in-person exhibitions at the Council Offices. Here you can view our exhibition boards which contain a summary of the consultation (please note both forms of exhibition will have the same information available).

**Local Plan Virtual exhibitions:** Will be available to view via [www.chelmsford.gov.uk/lp-exhibition](http://www.chelmsford.gov.uk/lp-exhibition)

**Local Plan in-person exhibition:** Drop in exhibitions will take place at the Civic Centre, where you will be able to speak to a representative of the Council. There is no booking required to attend these exhibitions, which will take place at the Chelmsford City Council Chamber, accessed via Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE on the following dates and times:

- Thursday 16 May 2024, 6pm to 8pm
- Friday 17 May 2024, 1pm to 3pm
- Saturday 18 May 2024, 10am to 12noon
- Thursday 13 June 2024, 6pm to 8pm
- Friday 14 June 2024, 1pm to 3pm
- Saturday 15 June 2024, 10am to 12noon (*with British Sign Language interpreter available on this date*).

Further Local Plan exhibitions will be on display as follows. These will not be staffed.

- Monday 20 May to Friday 24 May, 7am to 6.30pm at High Chelmer Shopping Centre, 15a Exchange Way, Chelmsford, CM1 1XB
- Thursday 30 May, Friday 31 May, Monday 3 June to Friday 7 June, Monday 10 June and Tuesday 11 June, 9am to 4pm, South Woodham Town Council, Champions Manor Hall, Hullbridge Road, SWF.

**Local Plan Website:** Please visit our website [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review) for further information on the consultation and the Local Plan review process.

**Please note that any representations must be received by the Council no later than 4pm on Wednesday 19 June 2024. We are unable accept anonymous representations and any comments received after the closing date cannot be accepted.**

The Council will acknowledge receipt of your comments and fully consider them, although we will not enter into individual correspondence.

All duly-made comments will be published on the Council's Consultation Portal in accordance with the General Data Protection Regulations.

Section 149 of the Equality Act 2010 requires that the Council should avoid any form of discrimination and also foster good relations between different ethnic groups. Comments which are deemed to be discriminatory will be inadmissible and will not be accepted.

Jeremy Potter  
Spatial Planning Services Manager

May 2024



# Welcome

## Thank you for visiting today

### What is the Local Plan

Our Local Plan shapes future growth and development of Chelmsford City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas and land uses that will be protected.

#### Why are we reviewing the adopted Chelmsford Local Plan?

We adopted our current Local Plan in May 2020, and good progress is being made with implementing it.

We need to review the plan at least every five years to make sure it remains up to date and meets the changing needs for development growth to 2041.

This consultation is called the Preferred Options. It is the second of three stages of consultation towards updating the adopted Local Plan and has been prepared following the Issues and Options public consultation in 2022. It is your opportunity to feed into the review process and help to shape the plan and the future of your area.

Government requirements mean that we must provide more homes but our aim is to get the right type of development in the right places to meet the growing needs of local people and businesses, while protecting our environment.

If the Local Plan becomes out of date, the Council could have very little influence over the location of new development and supporting infrastructure. Sites could be promoted for development in locations that the Council and its communities want to protect, and which are not considered sustainable.

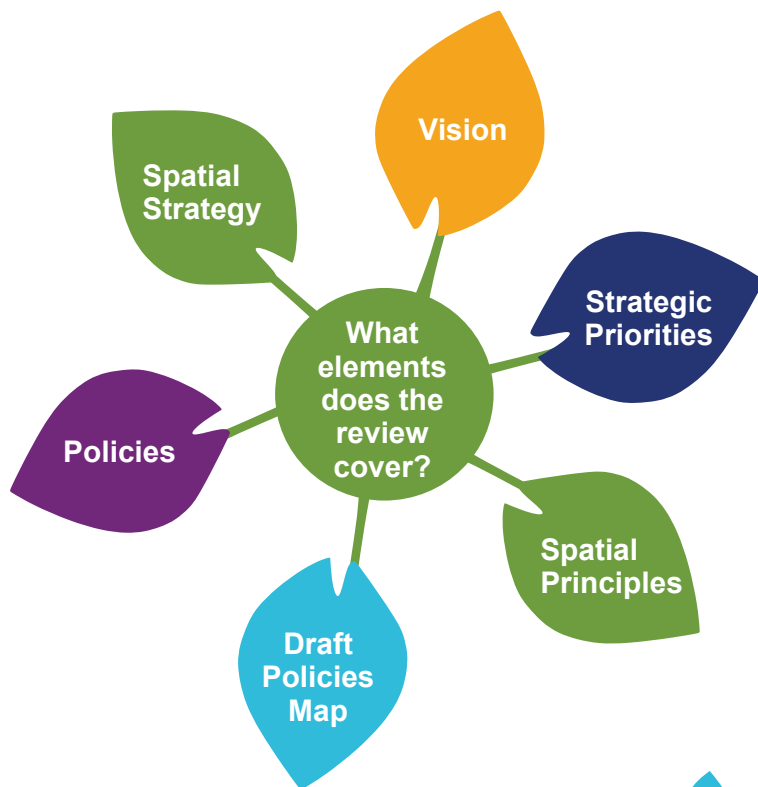
#### What is included in the consultation?

We want to make sure we cover the right issues and that all the suitable options for accommodating change are considered. The Preferred Options document is a full draft local plan, and includes the following key changes to the adopted Local Plan:

- Updated draft Strategic Priorities
- New draft Vision
- The amount of future development needed, including for homes and jobs
- Draft Spatial Strategy, including new site allocations, for accommodating this future development to 2041 and beyond
- Reviewed planning policies.

Many parts of the adopted Local Plan and its policies are still up to date and generally performing well, so they require no or only partial changes. Some changes and new policies are needed to reflect the latest national planning policy requirements, the Council's new ambitions and aspirations, and new development growth to 2041 and beyond.

The Local Plan is still evolving and no firm decisions have been made at this stage. However, we will not be reopening the debate on development sites which have already been allocated in the adopted Local Plan.





# Preferred Options – Background and Challenges

Chelmsford is already an attractive place, comprising the City of Chelmsford, the town of South Woodham Ferrers, numerous villages within attractive countryside and a rich and diverse natural and historic environment. The growth that has taken place, over past 25 years, has helped shape Chelmsford into the successful place it is now.

Vital new infrastructure has been delivered alongside new homes, jobs, shops and leisure opportunities. Chelmsford's economy shows strengths across many sectors, but especially finance, health and education.

Taking into account the projected population increase, we are determined to ensure that future growth continues to take place in a sustainable way. This will bring further improvements to the quality of life for residents and much needed new community and transport infrastructure whilst at the same time protecting and enhancing the natural and historic environment.

The Local Plan will be forward looking, shaping the sustainable planning of Chelmsford's development and infrastructure needs not just in the foreseeable future but also providing a longer-term framework.

## Previous consultation

We consulted on the first stage of reviewing the Local Plan, called the Issues and Options, from August to October 2022.

A total of 1,178 responses were received from 711 people or organisations, along with a petition. Responses came from a wide variety of groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other Local Authorities and Parish/Town Councils.

We have published a document setting out a review of the consultation activity, a summary of the representations we received, and how these comments have been used to develop the Preferred Options document that we are consulting on now.

You can read this 'You said, We Did' feedback report on our website at [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review).

All the comments received can also be viewed on the Council's planning policy consultation portal at [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult).

## Challenges

**Population** – is predicted to increase by 11.5% to 202,300 by 2041. Demographic changes will shape the type and size of accommodation necessary over the Local Plan period.

**Economy** – 12.5% growth in jobs is anticipated by 2041. Due to its location and high education standards, Chelmsford is expected to accommodate a major share of the forecast new employment growth. Significant additional land for employment is proposed through the Local Plan.

**Transport** – Chelmsford occupies a key place on the regional road and rail network. New development can generate additional service provision and transport investment, through direct provision of facilities and/or financial contributions from developers.

**Environment** – Chelmsford enjoys a high quality environment including recreational space, parks, gardens, nature reserves and the designated Green Wedge – and over 1,000 Listed Buildings. Development proposals need to balance the needs of development with the preservation and enhancement of natural and historic assets.

**Housing** – The Council has declared a housing crisis, with many individuals and families in temporary or unsuitable accommodation, an often expensive private rented sector, and an overall limited supply of affordable housing. The Local Plan can help to address this through housing allocations, setting an appropriate mix of homes, and working with housing partners.

**Climate change** – A climate and ecological emergency was declared in 2019 to tackle the consequences of climate change and reduce our impact on the planet. Closer to home, the Local Plan can set requirements for zero carbon development, boost active and sustainable travel, require expansion of natural habitats, and improve water efficiency and flood risk management.

**Communities** – health inequalities and wellbeing opportunities can be tackled through the Local Plan by providing the conditions for stronger and more-connected communities.



# What has been considered

The Spatial Strategy, setting out where new development should be located, takes the following as a starting point:



## Our Strategic Priorities

Our Strategic Priorities are the key priorities which set the overall policy direction for the Local Plan.

Priorities for climate	Priorities for growth	Priorities for place
1. Addressing the Climate and Ecological Emergency	4. Ensuring sustainable patterns of development and protecting the Green Belt	7. Creating well designed and attractive places, and promoting the health and social wellbeing of communities
2. Promoting smart, active travel and sustainable transport	5. Meeting the needs for new homes	8. Delivering new and improved strategic and local infrastructure
3. Protecting and enhancing the natural and historic environment, and support an increase in biodiversity and ecological networks	6. Fostering growth and investment and providing new jobs	9. Encouraging resilience in retail, leisure, commercial and cultural development

## The proposed updated Vision

Guiding Chelmsford's growth towards a greener, fairer and more connected community

The Local Plan Vision is a high-level guiding statement that sets out what is important for a place and how change will be managed in the future. It is a core part of a Local Plan and all the policies in the Plan will together deliver the Vision. We have reviewed the Local Plan Vision to reflect the new local priorities within the Council's Corporate Plan - Our Chelmsford, Our Plan. We have also considered other national and local priorities and Chelmsford's challenges and opportunities. It has also been simplified, shortened and purposefully aligned to the Corporate Plan, to make it easier to use.

## Spatial Principles

The Spatial Principles will ensure that the Local Plan focuses growth in the most sustainable locations.

- a) Locate development at well-connected and sustainable locations
- b) Protect the Green Belt from inappropriate development
- c) Promote the use of suitable previously developed land for development
- d) Continue the renewal and enhance the vitality of Chelmsford City Centre and its Urban Area
- e) Focus development at the higher order settlements outside the Green Belt and respect the development pattern and hierarchy of other settlements
- f) Respect the character and appearance of landscapes and the built environment, and preserve or enhance the historic and natural environment and biodiversity
- g) Locate development to avoid or manage flood risk and reduce carbon emissions
- h) Ensure development is served by necessary infrastructure and encourage innovation
- i) Locate development to utilise existing and planned infrastructure effectively
- j) Ensure development is deliverable.

## Settlement Hierarchy

Another factor for developing the Spatial Strategy and choosing areas for growth is the Settlement Hierarchy, which ranks towns and villages according to their size, function, characteristics and sustainability.



# How much growth are we planning for?

The adopted Local Plan has allocated sites for development which are now coming forward, with Masterplans being approved and planning applications decided or in progress.

We need to work out how many more houses to plan for until 2041 using a formula set by the Government, called the standard method.

<b>Housing requirement for Plan period</b>	<b>22,567 homes</b>
Completions 2022-23	822
Adopted Local Plan allocations	12,677
Sites with planning permission	3,745
Windfall allowance (2026-2041)	1,461
<b>New allocations needed</b>	<b>3,862</b>

The Local Plan also plans to meet future employment needs by providing additional employment allocations.

<b>Employment requirement for Plan period</b>	<b>162,646 sqm</b>
Adopted Local Plan allocations	55,000 sqm
<b>New allocations needed</b>	<b>107,646 sqm</b>

New housing development, in particular, will be required to provide supporting infrastructure, services and facilities including for:

- Transport improvements including the New Beaulieu Park Rail Station, Chelmsford North East Bypass, Army and Navy junction improvements, and sustainable travel routes
- Community buildings, schools, healthcare, wellbeing measures, sports and cultural facilities
- Green infrastructure including new Country Parks, open space, green/blue networks, biodiversity and public realm improvements
- Preservation and enhancement of historic assets
- Flood risk management and utility infrastructure

New development allocations will be focused on three growth areas of Central and Urban Chelmsford, North Chelmsford and South and East Chelmsford. This distribution of growth is shown on the Key Diagram.



## Discounted locations for development

Areas have been discounted as follows:

- The Green Belt, a national designation to prevent encroachment of urban growth into undeveloped areas. This covers almost 34% of the land in the south and west of Chelmsford, shaded in green on the Key Diagram
- The Green Wedge, a key local landscape designation of a green network which prevents urban sprawl and provides for wildlife and nature conservation, flood storage and active travel routes. This covers the river valleys where they pass into Chelmsford's urban area, shaded in hatched green on the Key Diagram
- Areas with known severe constraints/capacities including highways and education
- Areas where no land was being promoted through the Call for Sites exercise
- Areas which did not appear in the Issues and Options consultation document (for housing development).

# Growth Area 1 – Central and Urban Chelmsford

Development in this area will deliver a number of benefits including green infrastructure and city greening, enhanced bus services, and opportunities to maximise walking and cycling into the City Centre. Previously developed land in the City Centre will be used to strengthen and expand the City as a major residential and employment centre.



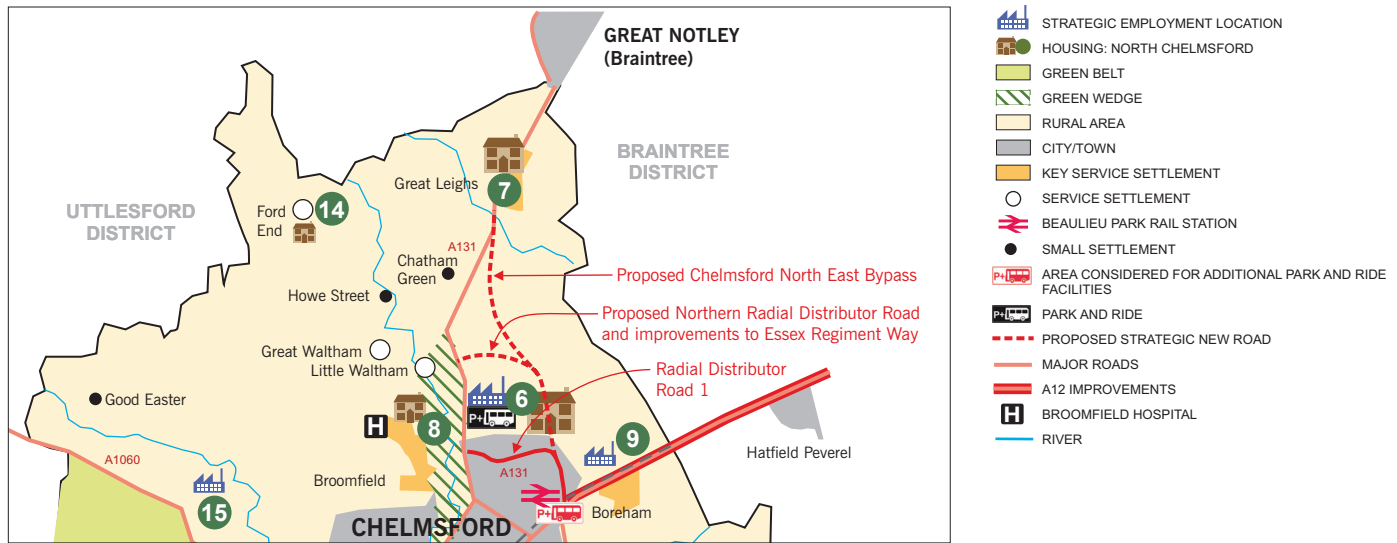
Growth Area 1 – Central and Urban Chelmsford		
Development Allocations	Total Homes	Employment Floorspace
1 Previously developed sites in Chelmsford Urban Area <b>New sites:</b> Meadows Shopping Centre/Surface Car Park Former Kay Metzeler, Brook Street Land between Hoffmanns Way and Brook Street Granary Car Park, Victoria Road Coval Lane Car Park Glebe Road Car Park	2,765	4,000sqm Use Class E(g)(i-ii)
2 West Chelmsford	880 plus 5 Travelling Showpeople Plots	
3a East of Chelmsford - Manor Farm	360	
3b East of Chelmsford - Land North of Maldon Road		5,000sqm Office/Business Park
3c East of Chelmsford - Land South of Maldon Road	109	
3d East of Chelmsford - Land North of Maldon Road	65	
4 Land North of Galleywood Reservoir	24	
5 Land surrounding Telephone Exchange, Ongar Road, Writtle	25	
<b>Area Total</b>	<b>4,228</b>	<b>9,000sqm</b>

New supporting infrastructure in Growth Area 1
Primary school
Four early years and childcare nurseries
Two new special schools
Country park
Access to Sandford Mill and a visitor centre
Financial contributions to provision of education, community facilities, healthcare, sports and recreation facilities, sustainable transport, local mobility hub and road network enhancements



# Growth Area 2 – North Chelmsford

Development in this area will deliver a substantial number of new homes and employment over the Local Plan period, underpinned by a comprehensive package of new infrastructure including new schools, early years and childcare provision, green infrastructure and neighbourhood centres. Significant growth is proposed to Chelmsford Garden Community, along with extensions to two employment sites, and two small village allocations.

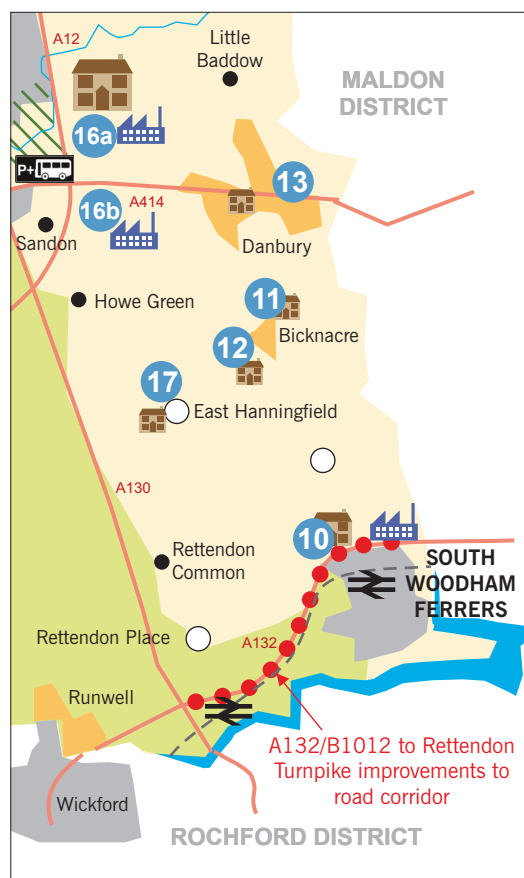
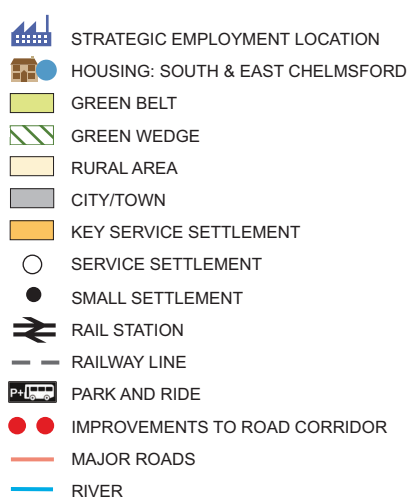


Growth Area 2 – North Chelmsford		
Development Allocations	Total Homes	New Employment Floorspace
6 North East Chelmsford (Chelmsford Garden Community)	6,250, plus 10 Traveller Pitches and 10 Travelling Showpeople Plots	56,946sqm Office/Business Park
7a Great Leighs - Land at Moulsham Hall	750, plus 5 Travelling Showpeople Plots	
7b Great Leighs - Land East of London Road	190	
7c Great Leighs - Land North and South of Banters Lane	100	
8 North of Broomfield	512	
9a New Site: Waltham Road Employment Area		3,500sqm B2/B8
14a New Site: Land west of Back Lane, Ford End	20	
14b New Site: Land south of Ford End Primary School, Ford End	20	
15 New Site: Little Boyton Hall Farm Rural Employment Area		6,000sqm B2/B8
<b>Area Total</b>	<b>7,842</b>	<b>66,446sqm</b>

New supporting infrastructure in Growth Area 2
Transport including Phase 1 of Chelmsford North East Bypass, Northern Radial Distributor Road, bus infrastructure
Six village/neighbourhood centres
Secondary school
Five primary schools
Seven early years and childcare nurseries
Country park
Financial contributions to Beaulieu Park Railway Station, provision of education and community facilities, healthcare, sports and recreation facilities, sustainable transport and road network enhancements

# Growth Area 3 – South and East Chelmsford

Proposals include a high quality and comprehensively planned new Garden Community to the East of Chelmsford at Hammonds Farm, with a wide range of supporting uses. Also proposed is a strategic employment site, along with four smaller village allocations to contribute towards supporting existing village facilities and services.



Growth Area 3 – South and East Chelmsford		
Development Allocations	Total Homes	New Employment Floorspace
16a New Site: East Chelmsford Garden Community (Hammonds Farm)	3,000 (plus 1,500 homes post 2041), plus 20 Traveller Pitches	43,000sqm Business Space
16b New Site: Land adjacent to A12 Junction 18		43,000sqm Business Space
10 North of South Woodham Ferrers	1,220, plus 5 Travelling Showpeople Plots	1,200sqm Business Space
11a South of Bicknacre	42	
11b New Site: Land at Kingsgate, Bicknacre	20	
11c New Site: Land west of Barbrook Way, Bicknacre	20	
12 St Giles, Bicknacre	32	
13 Danbury	100	
17a New Site: Land north of Abbey Fields, East Hanningfield	15	
17b New Site: Land east of Highfields Mead, East Hanningfield	20	
<b>Area Total</b>	<b>4,469</b>	<b>87,200sqm</b>

New supporting infrastructure in Growth Area 3
Secondary school, up to four primary schools and eight early years and childcare nurseries
Neighbourhood centres
Transport including Bus Based Rapid Transit infrastructure, safe multi-user access routes, and capacity improvements to A132
Country park
Financial contributions to provision of education and community facilities, healthcare, sports and recreation facilities, sustainable transport and road network enhancements



# New Sites in Chelmsford City Centre and Urban Area

We are proposing to allocate some additional sites in Chelmsford City Centre.

Using previously developed – or brownfield – land will help to strengthen the City as a major residential centre to build on its past success and continue its regeneration. It will also reduce the amount of greenfield land we need to allocate.

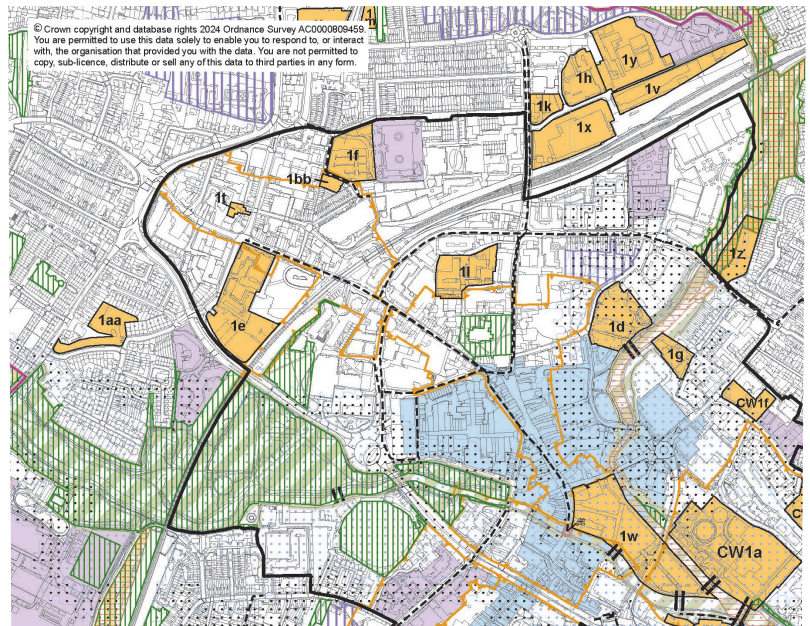
New proposed site allocations will provide around 2,765 new homes including affordable homes.

Site	Proposal	Supporting Infrastructure
1w Meadows Shopping Centre and Meadows Surface Car Park	Around 350 homes	Enhanced pedestrian and cycle routes Local mobility hub Improved access to waterways On-site open space
1x Former Kay Metzeler Premises, Brook Street	Around 185 homes	Play area with equipment Pedestrian and cycle connections Preserve nearby listed buildings Public realm improvements
1y Land between Hoffmans Way and Brook Street	Around 100 homes	Play area with equipment Pedestrian and cycle connections Preserve nearby listed buildings Public realm improvements
1z Granary Car Park, Victoria Road	Around 60 homes	Links to pedestrian/cycle network Preserve nearby listed buildings Retain natural landscaping and setting Make good use of the waterside location
1aa Coval Lane Car Park	Around 40 homes	Retain natural landscaping Provide sustainable drainage and flood risk management
1bb Glebe Road Car Park	12 homes	Conserve the setting of nearby listed buildings

There are 20 allocated sites in the City Centre being brought forward from the adopted Local Plan, including some where numbers have been slightly increased.

Sites in the Urban Area will also be brought forward, as they have already been allocated in the adopted Local Plan. These are at:

- West Chelmsford
- East of Chelmsford
- Galleywood
- Writtle





# New Proposed Garden Community

## 16a – East Chelmsford Garden Community (Hammonds Farm)

We are proposing to allocate land for a new East Chelmsford Garden Community. This is centred on Hammonds Farm, to the east of the A12 and north of the A414 Maldon Road.

<b>New homes including affordable</b>	3,000 (plus 1,500 homes post 2041), and 20 Traveller Pitches
<b>New employment floorspace</b>	43,000sqm
<b>Supporting infrastructure</b>	Country Park and significant new multi-functional green infrastructure and landscape
	Mixed use centres for food and other shopping, community uses, healthcare provision
	All through school, potential sixth form centre, three primary schools, six early years and childcare nurseries
	New access junction from A414 (shared with 16b); pedestrian and cycle connections; mobility hubs and bus transport; safe pedestrian/cycle access routes under and over the A12, including to Park and Ride site, and Beaulieu Park Rail Station
<b>Historic and natural environment</b>	Preserve the Conservation Areas and listed buildings
	Protect and retain the protected lanes and reinstate historic landscape features
	Conserve Local Wildlife Sites, Nature Reserves, ancient woodlands and SSSI
	Provide sustainable drainage and flood risk management
	Provide a minimum of 20% biodiversity net gain

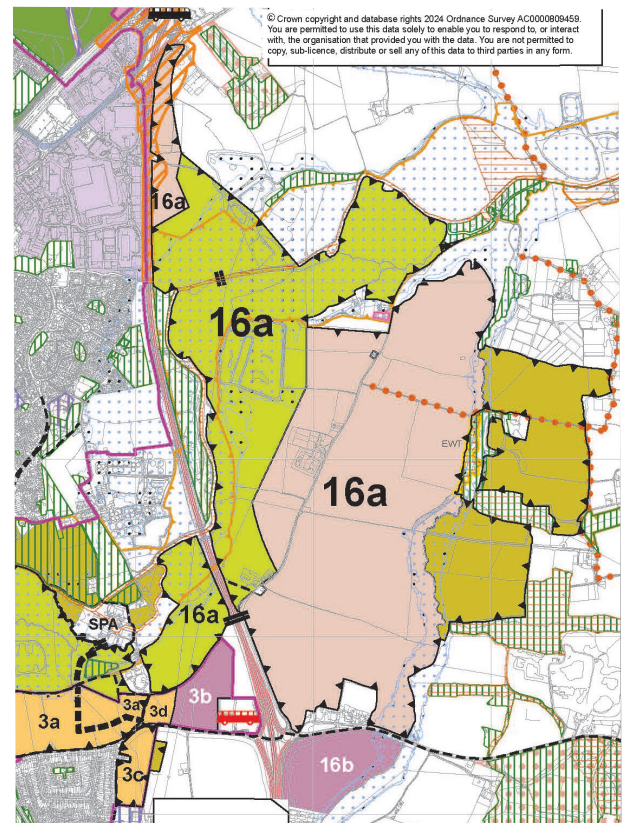
High quality garden community development will be provided through Garden City Principles. These include:

- community and stakeholder involvement in design and delivery with long-term governance and stewardship arrangements
- meeting the housing needs of all local people
- providing integrated and sustainable transport systems

## 16b – Land adjacent to A12 Junction 18 – Employment Area

We are also proposing to allocate a separate area of land for new employment uses adjacent to Junction 8 of the A12, south of the A414.

<b>New employment floorspace</b>	43,000sqm for mixed employment types
<b>Supporting infrastructure</b>	New access junction from A414 (shared with 16a) plus multi-user crossings
	Safe pedestrian/cycle access connections including to Park and Ride site, Hammonds Farm, bus stops and Danbury
<b>Historic and natural environment</b>	Preserve Danbury Conservation Area
	Retain boundary trees, plant new trees and extensive landscape buffers

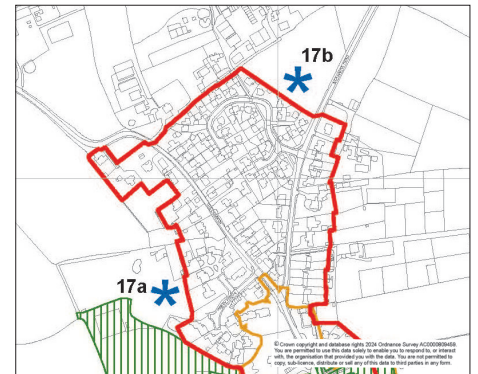
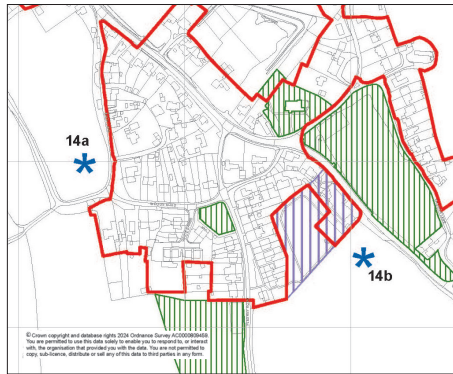
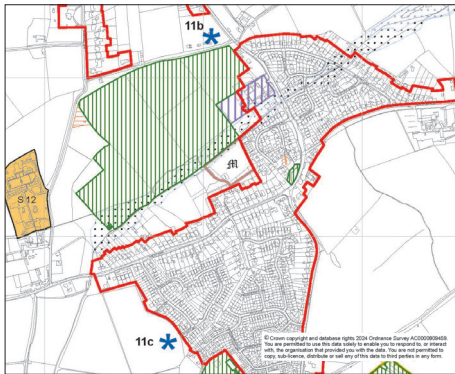




# Proposals for Villages

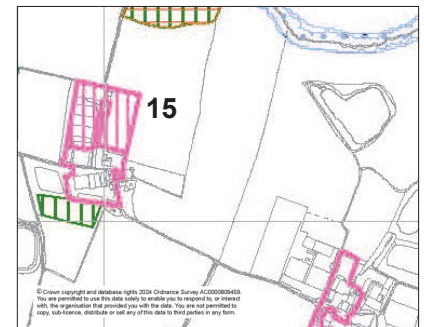
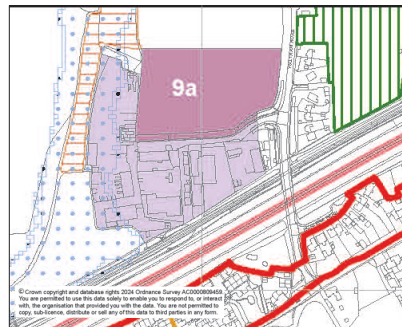
Limited development is proposed in some villages including Bicknacre, Ford End, East Hanningfield, Boreham and Boyton Cross.

We aim to address the Government's requirement to allocate some smaller sites which can be built earlier in the Local Plan period and give smaller development companies the opportunity to build locally. Bicknacre, Ford End and East Hanningfield have primary schools and community facilities, making them suitable for small scale development, which will include affordable homes.



Village	Site	Proposal
Bicknacre	11b Land at Kingsgate, Bicknacre Road	Around 20 homes
	11c Land West of Barbrook Way	Around 20 homes
Ford End	14a Land West of Back Lane	Around 20 homes
	14b Land South of Ford End Primary School	Around 20 homes
East Hanningfield	17a Land North of Abbey Fields	Around 15 homes
	17b Land East of Highfields Mead	Around 20 homes

We also propose to expand two employment sites at Little Boyton Hall Farm, Boyton Cross and Waltham Road, Boreham. Expansion of these well-established employment sites will provide rural employment opportunities and support the sustainable growth and expansion of business in rural areas.



Site	Proposal
9a Waltham Road Employment Area, Boreham	3,500sqm B2/B8 use (general industrial, and storage and distribution)
15 Little Boyton Hall Farm Rural Employment Area, Boyton Cross	6,000sqm B2/B8 use (general industrial, and storage and distribution)



# What else is in the Local Plan?

We use the Local Plan policies to deliver the Strategic Priorities (what we want to achieve overall) and the Spatial Strategy (locations for growth). The different types of policies are set out below.

<b>Strategic Policies</b>	High level policies including for climate change, social inclusion, the natural environment, infrastructure, and housing requirements
<b>NEW</b>	Proposed new Strategic Policies: Health and Wellbeing, Creating Successful Places, Connectivity and Travel, Future of Chelmsford City Centre
<b>Site Policies</b>	Covering the amount of development, design guidance, and infrastructure that must be provided
<b>Development Management Policies</b>	All planning applications are considered against these policies to make sure they provide what is needed and protect what is important
<b>NEW</b>	Proposed new Development Management Policy: Net Zero Carbon Development (In Operation)
<b>Special Policy Areas</b>	For Broomfield Hospital, Chelmsford City Racecourse, Hanningfield Reservoir, RHS Hyde Hall Gardens, Sandford Mill, ARU Writtle
<b>Development Standards</b>	For all new residential development including privacy, open space, and recycling and waste guidance
<b>Policies Map</b>	All the proposals shown on a map

## Other consultations: Integrated Impact Assessment (IIA)

The Local Plan is subject to an ongoing process of assessing its proposals against a sustainability framework. This covers the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternative approaches.

## Other consultations: Neighbourhood Plans

Neighbourhood Plans have been developed by Broomfield and Danbury Parish Councils, and cover a wide range of issues such as landscape, transport, recreation, heritage, building design, and business. When they are adopted, both Neighbourhood Plans will become part of the Local Plan and will be used for planning decision making.

Both Neighbourhood Plans are proposing to allocate land for development as follows:

Broomfield	Community-led housing at Saxon Way with open space and a potential GP surgery A community facility for non-residential day facilities and local/informal green space at Broomfield Place You can find out more at: <a href="http://www.chelmsford.gov.uk/broomfieldplan">www.chelmsford.gov.uk/broomfieldplan</a>
Danbury	Around 93 homes across five sites at Sandpit Field (around 10 homes) Tyndales Farm West (around 65 homes) South of Jubilee Rise (around 2 homes) Woodhill Road (around 14 homes) Mayes Lane (around 2 homes) You can find out more at: <a href="http://www.chelmsford.gov.uk/danburyplan">www.chelmsford.gov.uk/danburyplan</a>



# Have your say

## Find out more

View the consultation documents on:

- our specially designed consultation portal [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult)
- on our website [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)

The consultation documents are:

- Preferred Options Consultation Document 2024
- Integrated Impact Assessment (IIA) of the Review of the Adopted Local Plan: Preferred Options 2024

## Visit one of our exhibitions

Thursday 16 May	Council Chamber, Civic Centre	6pm – 8pm
Friday 17 May	Council Chamber, Civic Centre	1pm – 3pm
Saturday 18 May	Council Chamber, Civic Centre	10am – 12noon
Monday 20 May to Friday 24 May	High Chelmer Shopping Centre (unstaffed)	7am – 6.30pm
Thursday 30 May Friday 31 May Monday 3 June to Friday 7 June Monday 10 June Tuesday 11 June	South Woodham Town Council, Champions Manor Hall, Hullbridge Road, SWF (unstaffed)	9am – 4pm
Thursday 13 June	Council Chamber, Civic Centre	6pm – 8pm
Friday 14 June	Council Chamber, Civic Centre	1pm – 3pm
Saturday 15 June *	Council Chamber, Civic Centre	10am – 12noon

\* with British Sign Language interpreter available

## How to comment

Making your comments through the consultation portal allows you to download the consultation documents and sign up for alerts to future consultation events.

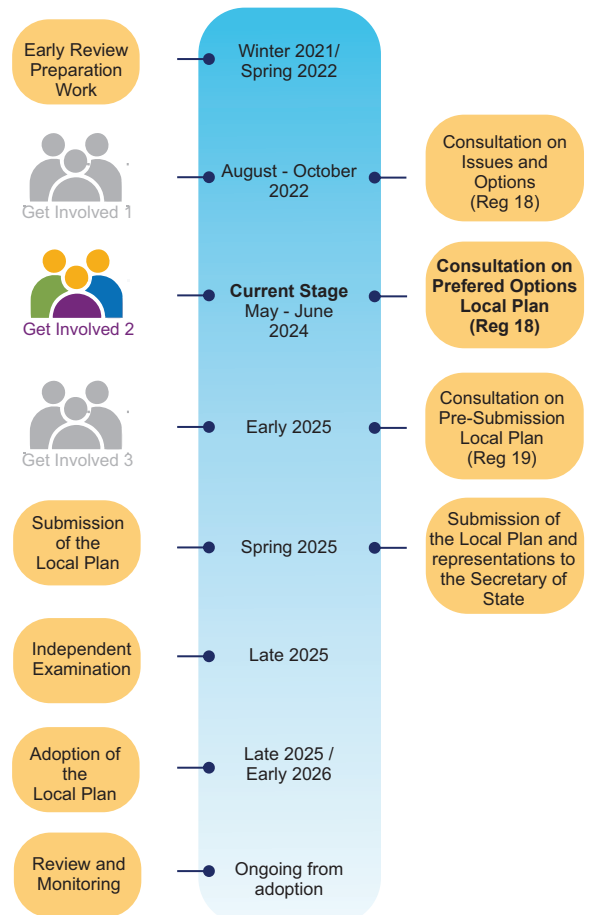
You can also make comments:

By email to [planning.policy@chelmsford.gov.uk](mailto:planning.policy@chelmsford.gov.uk)  
By post to Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE.

**The consultation on the Preferred Options documents runs for six weeks from 10am on Wednesday 8 May to 4pm on Wednesday 19 June 2024.**

## What happens next

We will consider all the comments received alongside further studies, the findings of the IIA and national planning policy to finalise the Pre-Submission Local Plan, for public consultation in early 2025.



Pop-Up Stand



# Review of Chelmsford Local Plan

Chelmsford City Council is reviewing its adopted Local Plan. This will set out where new development will take place up to 2041.



Find out more at  
[www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)  
Get involved by registering at  
[www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult)

Chelmsford  
Local Plan 



## Pop-Up Stand on Site

Pop up banners and leaflets displayed at the following venues during the PO consultation period May-June 2024.



Riverside Leisure Centre



Chelmsford Sports & Athletics Centre



SWF Leisure Centre



Chelmsford Museum

Click on the link, or copy and paste into your browser, to view the consultation materials.

**Local Plan Video:** <https://youtu.be/ZGpTRMhDIhw>



### Chelmsford's Local Plan - have your say



Chelmsford Council  
506 subscribers

Subscribe

7



Share

Save



**Local Plan Virtual Exhibition:** <https://chelmsford-2024.vercel.app/>



### Chelmsford Local Plan Review

Chelmsford City Council is consulting on a review of its adopted Local Plan with the Preferred Options consultation running from **8 May 2024 to 19 June 2024**.

View our exhibition to find out more. There are also links to the main consultation material.

This is the second of three stages of consultation towards updating the adopted Local Plan, and has been prepared following initial consultation in 2022. We want to make sure we cover the right issues and that all the suitable options for accommodating change are considered. This is your opportunity to feed into the review process and help to shape the plan and the future of your area.

## Review of the Chelmsford Local Plan - Get involved now!

We are reviewing our Local Plan which sets out how much new development is needed and identifies land for housing, schools, shops and jobs as well as areas for protection, such as open space and sites important for wildlife.

The Council's Local Plan was adopted in 2020. We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041 and beyond.

We undertook the first stage of consultation in 2022 and have carefully considered all the responses alongside updated evidence, national planning policy, new local priorities, and monitoring data to progress the Preferred Options stage.

The Preferred Options document is a full draft Local Plan and includes:

- updated and new Strategic Priorities.
- proposed new sites where new homes, jobs and other facilities could be located.
- new and updated policies that the Council would use to decide planning applications.

We are consulting on the Preferred Options Local Plan from 10am on Wednesday 8 May 2024 until 4pm on Wednesday 19 June 2024. We are inviting comments on the plan so residents can influence it and ensure that it is fit for purpose to meet local needs. We are not reopening any debates about already adopted allocated sites.

For more information go to [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)

### Why should I get involved?

I want to make sure Chelmsford has the best services and facilities

I want a say over how to improve my local area

I want a say over where new homes will be built

I want a say on local planning policies

I want to influence decision-making in my area

I want to make sure Chelmsford continues to be a place where I enjoy living and working



# City Life Articles



Home News What's on Community

# Top topics culture outdoors green spaces

News Community

## Next stage of public consultation on Chelmsford's Local Plan set to start in May

By Charlotte Maltby  
6 March 2024

planning local plan



The city council is reviewing its Local Plan to guide sustainable growth to 2041.



Home News What's on

# Top topics culture outdoors green spaces

News

## Planning talking points: calming the waters

By Corporate Communications  
9 May 2024

local plan planning sustainability consultation



Home News What's on

# Top topics culture outdoors green spaces

News

## Planning talking points: planning beyond homes — the big picture

By Corporate Communications  
22 May 2024

planning local plan



What image does 'planning' conjure up for you? Most people think of homes: houses, flats and maisonettes being built for the growing population. You might think about the [national housing crisis](#) and how difficult it is to afford a home in the UK right now, or about [where is and isn't appropriate for new homes to go](#).

However, planning isn't all about homes. The [Local Plan](#), which guides where and what



Home News What's on

# Top topics culture outdoors green spaces

News

## Your opportunity to shape Chelmsford's future growth

By Corporate Communications

8 May 2024

planning local plan city consultation



## How do you want Chelmsford to look in twenty years' time?



Home News What's on

# Top topics culture outdoors green spaces

News

## Planning talking points: can our homes be good for nature?

By Corporate Communications

17 May 2024

sustainable growth biodiversity local plan



leavers are often celebrated by ecologists as 'nature's engineers'. When they build dams,



Home News What's on

# Top topics culture outdoors green spaces

News

## Planning talking points: how a city is shaped

By Corporate Communications

22 May 2024

planning local plan



How Half Moon Square in Chelmsford city centre looks in current day

Have you ever walked through your town or village and wondered how it came to be what it is today? Why the village hall, the church, the shops and houses are laid out in the way they are?

FOCUS
Letters Page

## Over to You

### SAVE MALDON'S MEDICAL SERVICES- REF. ST PETER'S HOSPITAL

In a recent meeting held on 19th March, the South Woodham Ferrers Health and Social Care Groups presented concerning evidence to the NHS ICB regarding the potential closure of St Peter's Hospital. We are deeply troubled by the implications of these views which were expressed for our community's access to essential healthcare services. These views are not widely held by others in the Maldon District and believe South Woodham Ferrers would support the retention of St Peter's Hospital Services.

Save Maldon's Medical Services, a grassroots organization dedicated to preserving healthcare access in the whole Maldon District, is spearheading efforts to prevent the closure of St Peter's Hospital Services until a viable alternative, such as a new NHS Community Hospital in Maldon, can be provided.

It is paramount that we rally support from every household in South Woodham Ferrers to ensure that our voices are heard. Dispersing outpatient services across different locations such as Banks or other commercial buildings which might be available, potentially even outside the Maldon District, would be detrimental to the health and wellbeing of our community.

I urge you to amplify our message and raise awareness about this crucial issue. By shining a spotlight on the efforts of Save Maldon's Medical Services and the concerns of South Woodham Ferrers residents, we can work together to safeguard the future of St Peter's Hospital Services. Please write to your Member of Parliament explaining your concerns that services must be maintained in St Peter's for the foreseeable future and/or until a cohesive plan for locating these services is delivered.

Many residents have made their feelings known and we thank them, and Mayor Donna Eley, for their continued support. You can follow Save Maldon's Medical Services on Facebook where we have our 3000 people already involved.

**Steve Rogers**  
On behalf of SMMS

**REVIEW - PREFERRED OPTIONS CONSULTATION**

Chelmsford  
Local Plan

Chelmsford City Council is consulting on a review of its adopted Local Plan with the Preferred Options consultation running from 8 May 2024 to 19 June 2024.

This is the second of three stages of consultation towards updating the adopted Local Plan, and has been prepared following initial consultation in 2022. The City Council wants to make sure the Plan covers the right issues and that all the suitable options for accommodating change are considered. The consultation is your opportunity to feed into the review process and help to shape the plan and the future of our area.

Chelmsford City Council adopted the current Local Plan in May 2020. It needs to review the plan at least every five years, to make sure it remains up to date and meets the changing needs for development to 2041. The review considers new national policy and changing local people.

The Preferred Options Local Plan is a full draft Local Plan. It includes updated and new Strategic Priorities, site allocations for new homes and employment, and policies that will be used to decide planning applications.

Chelmsford Local Plan Review – Preferred Options Consultation

Chelmsford City Council is consulting on a review of its adopted Local Plan with the Preferred Options consultation running from 8 May 2024 to 19 June 2024.

This is the second of three stages of consultation towards updating the adopted Local Plan, and has been prepared following initial consultation in 2022. The City Council wants to make sure the Plan covers the right issues and that all the suitable options for accommodating change are considered. The consultation is your opportunity to feed into the review process and help to shape the plan and the future of our area.

Chelmsford City Council adopted the current Local Plan in May 2020. It needs to review the plan at least every five years, to make sure it remains up to date and meets the changing needs for development to 2041. The review considers new national policy and changing local circumstances. The aim is to get the right type of development in the right places to meet the growing needs of local people and businesses, while protecting our environment.

The Preferred Options Local Plan is a full draft Local Plan. It includes updated and new Strategic Priorities, site allocations for new homes and employment, and policies that will be used to decide planning applications.

**What is proposed in South Woodham Ferrers?**

The Preferred Options Local Plan carries forward the allocation of Land North of South Woodham Ferrers from the adopted Local Plan, called Strategic Growth Site 10. This is identified for 1,220 new homes, around 1,200sqm of business floorspace and a Travelling Showpeople site alongside supporting infrastructure including a new Neighbourhood Centre and early years and childcare nurseries. No other sites are proposed for allocation in South Woodham Ferrers.

Chelmsford City Council is inviting comments on the Preferred Options Local Plan to ensure that it is fit for purpose to meets local needs. It is not reopening any debates about the principle of already adopted allocated sites. The Council is also consulting on an Integrated Impact Assessment which assesses the impacts of the Preferred Options Local Plan in terms of key sustainability issues.

**How can I get involved?**

You can view and comment on the consultation documents during the consultation period on our specially designed consultation portal [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult)

Alternatively visit our Local Plan web page for details of the consultation, how to make your comments, and about our planned in-person exhibitions at [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)

Mobile Hairdresser

With 20 years experience  
For an appointment call Jacqui on  
**01245 324473**

Tel: 07983 439199

Sonia Barker  
Counsellor & Hypnotherapist

*Why suffer in silence?  
If depression, anxiety, a relationship issue, your weight or a phobia are having a negative impact on your life, take a look at my website to see how I may be able to help you!*

[soniabarkertherapy@gmail.com](mailto:soniabarkertherapy@gmail.com) [www.soniabarkertherapy.co.uk](http://www.soniabarkertherapy.co.uk)  
Based in South Woodham Ferrers, Chelmsford

Why suffer in silence

Hello, my name is Sonia & I'm a Counsellor & Hypnotherapist. My business is home based in South Woodham Ferrers.

Counselling can be used to treat a range of issues including depression, anxiety, grief, relationship issues, trauma & addiction. I offer clients a safe & confidential space in order to explore their presenting issue/s, helping them to identify possible root causes too. I also share coping strategies & small lifestyle changes that can help manage symptoms.

In my experience Hypnotherapy can also be beneficial to help manage depression & anxiety, making a direct change to the subconscious mind where all events, experiences & emotions are stored. I also offer hypnosis for weight loss.

The Preferred Options Local Plan includes a new home allocation for Land North of South Woodham Ferrers. What is proposed in South Woodham Ferrers? The Preferred Options Local Plan carries forward the allocation of Land North of South Woodham Ferrers from the adopted Local Plan, called Strategic Growth Site 10. This is identified for 1,220 new homes, around 1,200sqm of business floorspace and a Travelling Showpeople site alongside supporting infrastructure including a new Neighbourhood Centre and early years and childcare nurseries. No other sites are proposed for allocation in South Woodham Ferrers.

## Local Plan Poster



### Review of Chelmsford Local Plan – Get Involved Now!

We are reviewing our Local Plan which sets out how much new development is needed and identifies land for housing, schools, shops and jobs as well as areas for protection, such as open space and sites important for wildlife.

The Council's Local Plan was adopted in 2020. We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041 and beyond.

We undertook the first stage of consultation in 2022 and have carefully considered all the responses alongside updated evidence, national planning policy, new local priorities, and monitoring data to progress the Preferred Options stage. The Preferred Options document is a full draft local plan and includes:

- updated and new Strategic Priorities
- proposed new sites where new homes, jobs and other facilities could be located
- new and updated policies that the Council would use to decide planning applications



### Have Your Say!

**The Consultation runs from 10am on Wednesday 8 May 2024 until 4pm on Wednesday 19 June 2024.**

Read and comment on the documents at [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult). They will also be available to read during normal opening hours at the Council's Customer Service Centre in Chelmsford.

There will be an online exhibition and we will also be holding in-person exhibitions at the Civic Centre. These exhibitions will provide an opportunity for you to find out more and discuss the consultation with a Planning Officer. More information can be found at: [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)

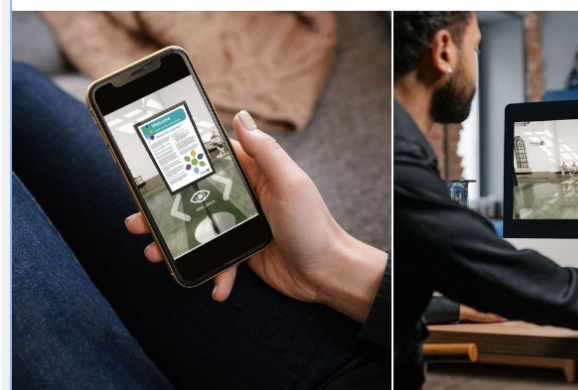
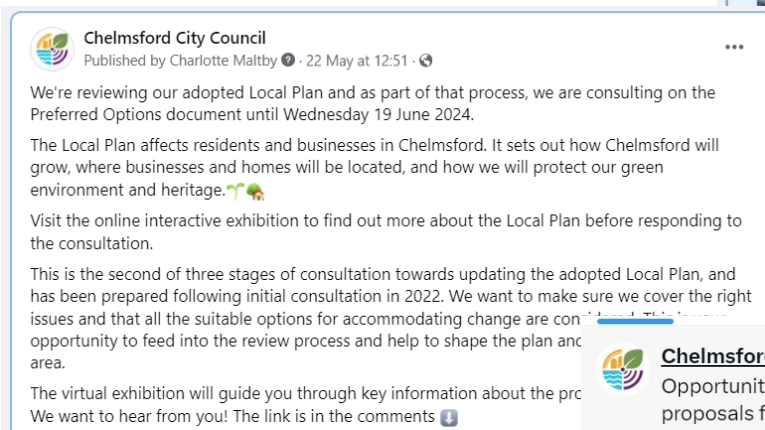
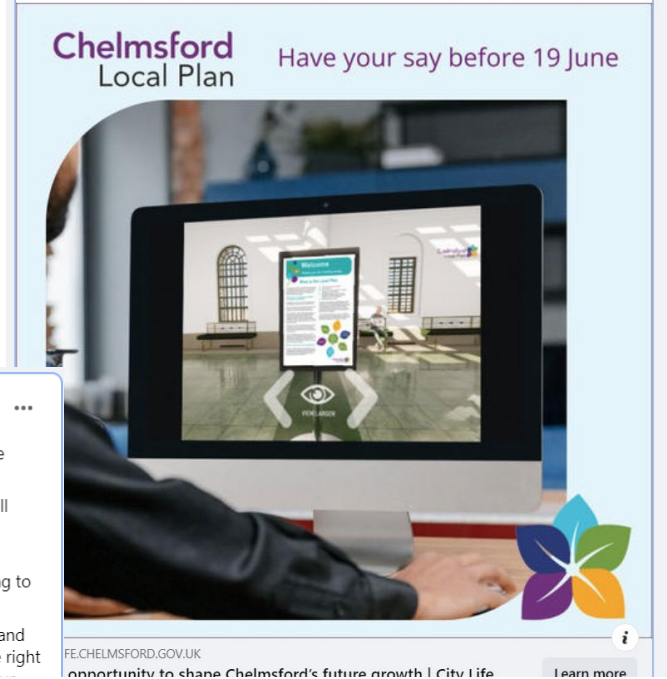
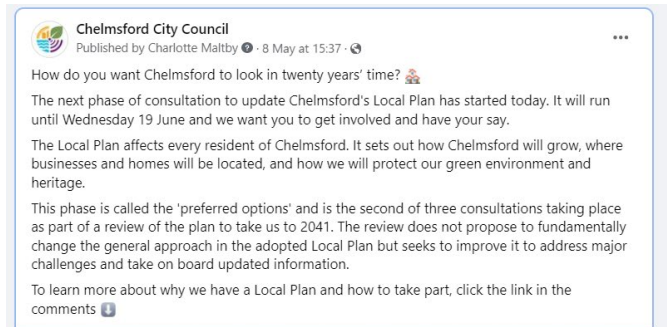
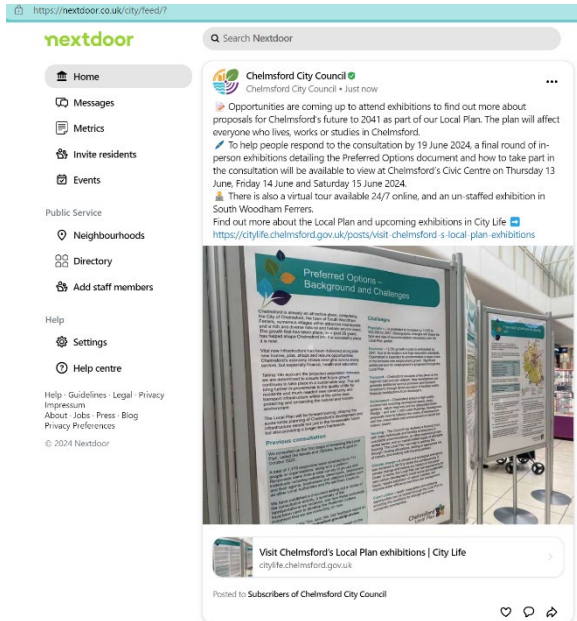
#### Visit an exhibition:

Thursday 16th May 2024	Civic Centre	6pm - 8pm
Friday 17th May 2024	Civic Centre	1pm - 3pm
Saturday 18th May 2024	Civic Centre	10am - 12pm
Thursday 13th June 2024	Civic Centre	6pm - 8pm
Friday 14th June 2024	Civic Centre	1pm - 3pm
Saturday 15th June 2024	Civic Centre	10am - 12pm

A British Sign Language interpreter will be available for the exhibition on 15 June

Find out more at [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review), telephone (01245) 606330 or email [planning.policy@chelmsford.gov.uk](mailto:planning.policy@chelmsford.gov.uk)

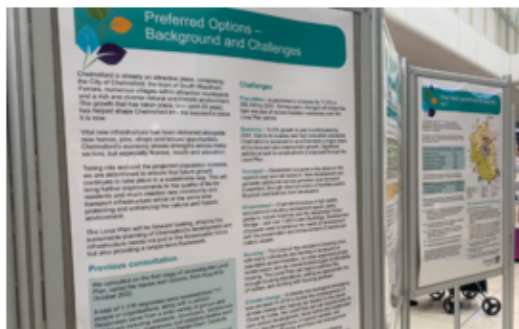
# Examples of Social Media Posts



## GovDelivery Mailshot (24<sup>th</sup> May, 31<sup>st</sup> May and 7<sup>th</sup> June 2024)

### Visit a virtual exhibition of the Local Plan review

A consultation on Chelmsford's Local Plan is running until **19 June** and there's still plenty of time to take a look at our virtual exhibition. The Local Plan will shape how the district develops over the **next 20 years** and will affect every resident of Chelmsford. Find out more about the proposals and how to have your say.



[Read more](#)

### Local Plan virtual exhibition

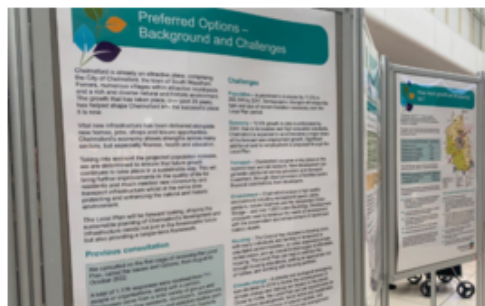
The council is reviewing its Local Plan and, as part of that process, a public consultation is currently running until **Wednesday 19 June**. Our online interactive exhibition is easy to navigate and it will guide you through key information about proposals for the Chelmsford district, which you can then respond to in the consultation.



[Read more](#)

### Local Plan consultation exhibitions

Opportunities are coming up to attend exhibitions in Chelmsford and South Woodham Ferrers to find out more about proposals for Chelmsford's future to **2041** as part of the Local Plan consultation. Find out more about the exhibitions and how to respond to the consultation, which runs until **4pm** on **19 June**.



[Read more](#)



# Example Site Notices



## LOCAL PLAN CONSULTATION SITE NOTICE 2024

### PREFERRED OPTIONS LOCAL PLAN SITE

**1aa—Coval Lane Car Park**

Chelmsford City Council have published for consultation its Preferred Options Local Plan.

This sets out future growth for Chelmsford up to 2041 and includes proposed site allocations for new residential and employment-led development. Site 1aa on the map shown is a **new** potential site allocation in the Preferred Options Local Plan.

Read and comment on the plan at [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult). Paper copies can also be viewed at the City Council's Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE, Monday to Friday 10am to 4pm (closed on bank holidays).

All information on this consultation is available at [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review).

**(THIS IS NOT A PLANNING APPLICATION)**




To find out more and discuss the consultation with a Planning Officer visit an in-person exhibition at the Civic Centre, Duke Street, Chelmsford on:

- Thursday 16th May 6pm-8pm
- Friday 17th May 1pm-3pm
- Saturday 18th May 10am-12pm
- Thursday 13th June 6pm-8pm
- Friday 14th June 1pm-3pm
- Saturday 15th June 10am-12pm (British Sign Language interpreter available on this day)

Please check our website [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review) for full details of all exhibitions and any changes to the timetable before making a special trip.

All representations must be received by 4pm on 19 June 2024.

If you require further assistance please call 01245 606330





## Staff Email Banner

**We're reviewing Chelmsford's adopted Local Plan**  
Find out more about the preferred options consultation running until 19 June 2024

**Chelmsford Local Plan**



## Bus Stop Adverts



# Local Plan Review Newsletter

NUMBER 2 May 2024

## What is a Local Plan?

A Local Plan shapes future growth and development of the City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas and land uses that will be protected.

### Why are we reviewing the adopted Chelmsford Local Plan?

We adopted our current Local Plan in May 2020 and good progress is being made with implementing it. We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041 including new homes, employment opportunities, and facilities for local people such as new schools, healthcare provision and upgraded transport infrastructure.

Government requirements mean we must provide more homes but our aim is to get the right type of development in the right places to meet the growing needs of local people and businesses while protecting our environment. If the Local Plan becomes out of date, the Council could have very little influence over the location of new development and supporting infrastructure.

### What stage is the review at?

We are currently at the Preferred Options stage in the plan review process, with the plan due to

be adopted in 2025/26. Many people and organisations commented on the first Issues and Options stage consultation in 2022. All the responses have been carefully considered and used to progress the Preferred Options alongside an updated plan evidence base, national planning policy, new local priorities, and monitoring data.

A 'You Said We Did' feedback report and the evidence base of technical studies can be read on our website: [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)

The Preferred Options document is a full draft local plan. It includes updated and new policies and sets out proposed sites where new homes, jobs and other facilities could be located, and contains policies that the council would use to decide planning applications.

We are inviting comments on the plan so residents can influence it and ensure that it is fit for purpose to meet local needs. We are not reopening any debates about the principle of already adopted allocated sites.



# New Development: Where and how much?

The Preferred Options plan follows the approach in the adopted Local Plan by continuing to focus new housing and employment growth to the most sustainable locations in three Growth Areas. The existing site allocations in the adopted plan which are not yet built are carried forward in the Preferred Options plan. Many of these sites are now coming forward, with masterplans being approved and planning applications decided or in progress and some sites have started building.

To meet additional growth needs to 2041 it is estimated that we need to allocate new sites for around 3,862 new homes with provision made for a further 1,500 new homes beyond 2041, and around 162,646sqm of new employment floorspace. This is over and above the new homes and employment land in the current plan. To accommodate this identified additional growth, we have reviewed the Spatial Strategy and are proposing new development sites. The preferred Spatial Strategy (Policy S7) shown in the consultation document has been informed by the outcome of the Issues and Options consultation and further evidence. **We are not considering growth in the Green Belt.**



## Central and Urban Chelmsford

Continued focus on strengthening the city as a centre for residential, employment and retail. Two existing allocations carried forward to the west and east of Chelmsford maximise cycling and walking opportunities into the City Centre.

### 1 Previously developed sites in Chelmsford Urban Area

- 2,765 homes (of which around 750 are on proposed new site allocations)

- 9,000sqm Business space

### 2 West Chelmsford

- 880 homes  
- 5 Travelling Showpeople Plots  
- Primary school and 2 nurseries  
- Neighbourhood Centre

### 3a-3d East of Chelmsford

- 3a Manor Farm: 360 homes  
- 3b Land North of Maldon Road: 5,000sqm Office/Business Park  
- 3c Land South of Maldon Road: 109 homes  
- 3d Land North of Maldon Road: 65 homes  
- Country Park  
- New pedestrian and cycle bridge to Sandford Mill

### 4 Land North of Galleywood Reservoir

- 24 homes

### 5 Land surrounding Telephone Exchange, Ongar Road, Writtle

- 25 homes

## North Chelmsford

North Chelmsford (Chelmsford Garden Community) will continue as a key area for new neighbourhoods and employment opportunities. New smaller allocations at Ford End and extensions to two existing employment areas. Existing allocations carried forward at Great Leighs and Broomfield.

### 6 North East Chelmsford (Chelmsford Garden Community)

- 6,250 homes

- 10 Gypsy and Traveller Pitches

- 10 Travelling Showpeople Plots  
- 56,946sqm Office/Business Park  
- Country Park  
- Chelmsford North East Bypass  
- 4 Neighbourhood Centres  
- 1 all-through school  
- 3 primary schools with nurseries  
- 2 nurseries

### 7a-7c Great Leighs

- 7a Land at Moulsham Hall: 750 homes  
- 5 Travelling Showpeople Plots  
- 7b Land east of London Road: 190 homes  
- 7c Land North and South of Banter's Lane: 100 homes  
- Neighbourhood Centre  
- Primary school with nursery

### 8 North of Broomfield

- 512 homes  
- Neighbourhood Centre  
- Nursery

### 9a Waltham Road Employment Area

- 3,500sqm B2/B8 Use

### 14a & 14b Ford End

- 14a Land west of Back Lane, Ford End: 20 homes  
- 14b Land south of Ford End Primary School: 20 homes

### 15 Little Boyton Hall Farm Rural Employment Area

- 6,000sqm B2/B8 Use

## South and East Chelmsford

Proposals include a new garden community at East Chelmsford (Hammonds Farm), and a strategic employment site. New smaller allocations in Bicknacre and East Hanningfield. Existing allocations carried forward at South Woodham Ferrers, Bicknacre and Danbury.

### 10 North of South Woodham Ferrers

- 1,220 homes  
- 5 Travelling Showpeople Plots  
- 1,200sqm Business Space  
- Neighbourhood Centre  
- 2 nurseries and potential primary school

### 11a-c Bicknacre

- 11a South of Bicknacre: 42 homes  
- 11b Land at Kingsgate: 20 homes  
- 11c Land west of Barbrook Way: 20 homes

### 12 St Giles, Bicknacre

- 32 homes

### 13 Danbury

- 100 homes

### 16a East Chelmsford Garden Community (Hammonds Farm)

- 3,000 homes to 2041 (plus 1,500 homes post 2041)  
- 20 Gypsy and Traveller Pitches  
- 43,000sqm Business Space  
- Country Park  
- Neighbourhood Centres  
- 1 all-through school  
- 2 primary schools and nursery  
- 3 nurseries

### 16b Land adjacent to A12 Junction 18

- 43,000sqm Business Space

### 17a & 17b East Hanningfield

- 17a Land North of Abbey Fields: 15 homes  
- 17b Land east of Highfield Mead: 20 homes

**Highlighted text: Proposed new development allocations in the review of Local Plan.**

## Local Plan policies

There are a number of new and updated policies included within the Preferred Options Local Plan. These cover many topics including housing, climate change, economy, environment, health and wellbeing, travel and transport, heritage, and design. We are not proposing to fundamentally change the general approach in the adopted Local Plan, but we want to take on board updated information and address some of our major challenges including acting on the climate emergency, responding to the housing affordability crisis and strengthening community ties.

It is important to note that the Local Plan is still evolving, and no firm decisions have been made at this stage. We will continue to gather evidence throughout the Local Plan preparation and the Preferred Options consultation will be an important aspect of this. **All the evidence and comments received will be used to prepare the final draft version of the Local Plan.**

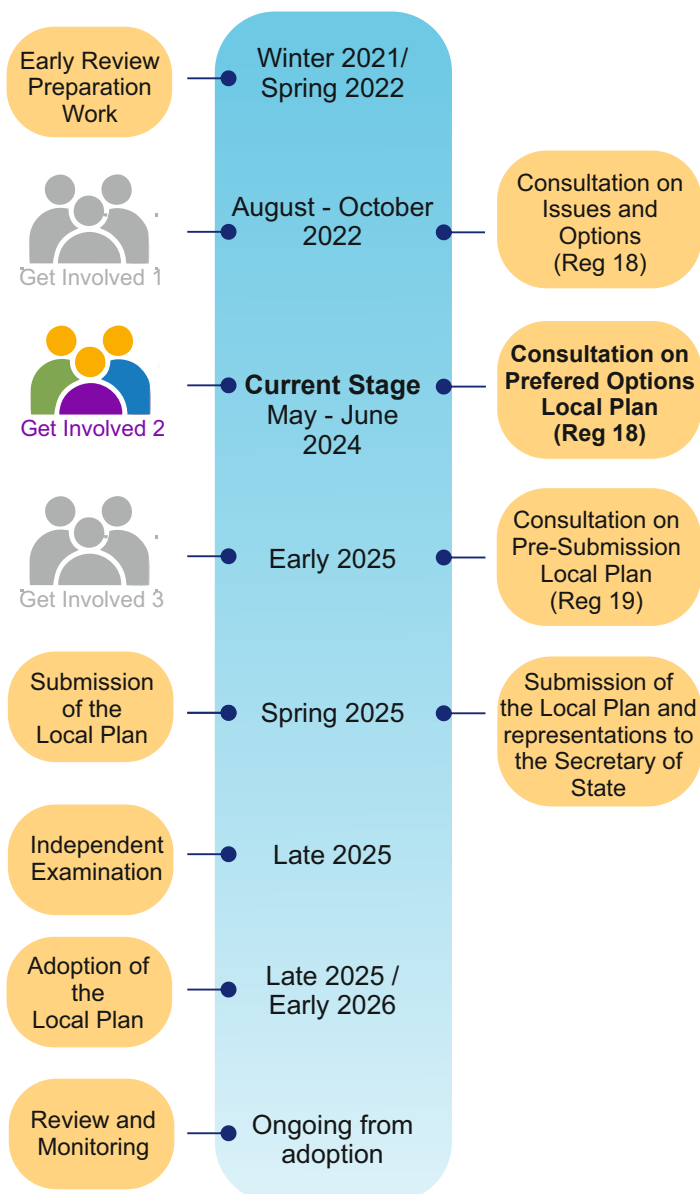
## What is the Integrated Impact Assessment (IIA)?

The IIA identifies the key sustainability issues for the Review of the Local Plan. These feed into a framework against which the proposals have been assessed. It covers the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternatives. The IIA includes:

- Sustainability Appraisal (SA)
- Strategic Environmental Assessment (SEA)
- Habitats Regulations Assessment (HRA)
- Health Impact Assessment (HIA)
- Equality Impact Assessment (EqIA)

We will be consulting on the IIA as part of the Preferred Options consultation.

## What is the Local Plan timetable?



## Where can I view the consultation documents?

The consultation documents will be available to view and comment on via our consultation portal at [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult). They will be available to read during normal opening hours at the Council's Customer Service Centre in Chelmsford.

There is an interactive online exhibition available during the consultation period – this can be found at [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review). We will also be holding in-person exhibitions at Civic Centre, Duke Street, Chelmsford. These exhibitions will provide an opportunity for you to find out more and discuss the consultation with a Planning Officer. These will be held on

- Thursday 16th May 2024 6pm - 8pm
- Friday 17th May 2024 1pm - 3pm
- Saturday 18th May 2024 10am - 12pm
- Thursday 13th June 2024 6pm - 8pm
- Friday 14th June 2024 1pm - 3pm
- Saturday 15th June 2024 10am - 12pm (with British Sign Language interpreter available)

## Consultation dates and how to have your say



The consultation on the Preferred Options documents runs for a period of six weeks from 10am on Wednesday 8 May 2024 to 4pm on Wednesday 19 June 2024. Comments made before or after these dates will not be considered.

You can respond:

- Via our consultation portal at [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult).
- By email to [planning.policy@chelmsford.gov.uk](mailto:planning.policy@chelmsford.gov.uk)
- By post to Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE.

### Next Steps

All comments will be used to inform the next stage of the process, the Pre-Submission Local Plan. We plan to consult on this in 2025.



This publication is available in alternative formats including large print, audio and other languages

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# Chelmsford Local Plan Review: Preferred Options Consultation Document

## Integrated Impact Appraisal Report – Feedback Report

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### 1. Introduction

#### 1.1 Chelmsford Local Plan Review: Preferred Options Consultation Document

Chelmsford City Council (the Council) is currently preparing the Chelmsford Local Plan Review (the 'Local Plan Review'). Once adopted, the Local Plan Review will replace the Adopted Local Plan<sup>1</sup>, setting out how much new development will be accommodated in the Council's administrative area (the 'City Area') to 2041, along with where this growth will be located. The Local Plan Review will also establish the policy framework for managing development proposals, containing planning policies which support the proposed vision: *"Guiding Chelmsford's growth towards a greener, fairer and more connected community."*

The first stage in the development of the Local Plan Review was the publication of the Chelmsford Local Plan Issues and Options Consultation Document (the 'Issues and Options Consultation Document')<sup>2</sup> that was consulted on between 11<sup>th</sup> August 2022 and 20<sup>th</sup> October 2022. The Issues and Options Consultation Document set out, and sought views on, the planning issues that face Chelmsford over the next 15 years and spatial approaches to meeting these challenges in terms of the amount and broad location of future development in the City Area. An Integrated Impact Appraisal (IIA) Report<sup>3</sup> was prepared to accompany the Issues and Options Consultation document.

Subsequently, the feedback received as part of the Issues and Options Consultation was used to prepare the Preferred Options Consultation Document, which accompanied by an Integrated Impact Assessment which included a Habitats Regulations Assessment<sup>4</sup>. Consultation on the documents took place between 8<sup>th</sup> May 2024 and 19<sup>th</sup> June 2024.

The consultation responses made to the Preferred Options IIA Report which included a HRA Assessment are set out in this report.

#### 1.2 The Integrated Impact Appraisal Report

The Council is required to carry out a Sustainability Appraisal (SA) of the Local Plan Review<sup>5</sup>. IIA is a means of ensuring that the likely social, economic and environmental effects of the Local Plan Review are identified, described and appraised and also incorporates a process set out under UK

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<sup>1</sup> <https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/adopted-local-plan/>

<sup>2</sup> <https://www.chelmsford.gov.uk/media/chehlnlq/issues-and-options-consultation-document.pdf>

<sup>3</sup> <https://www.chelmsford.gov.uk/media/undd2l1y/chelmsford-local-plan-issues-and-options-ia.pdf>

<sup>4</sup> [Consultation Home - Keystone \(chelmsford.gov.uk\)](https://www.chelmsford.gov.uk/consultation-home-keystone)

<sup>5</sup> The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.



regulations<sup>6</sup> called Strategic Environmental Assessment (SEA) which requires that environmental considerations are embedded into the development of plans and programmes such as local plans. IIA brings together SA and SEA, as well as Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA) within a single document. The HIA and EqIA are bespoke assessments designed to specifically address health and equalities matters in order to meet legislative requirements.

### 1.3 Habitats Regulations Assessment Report

The Conservation of Habitats and Species Regulations 2010 (as amended) requires local authorities to assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be any likely significant effects as a result of the plan's implementation. This process is known as Habitats Regulations Assessment (HRA). As part of the IIA, the HRA (**Appendix L**) provides a preliminary conclusion on the likely effects of the Review of the Adopted Local Plan, which has been undertaken, based on the spatial approaches contained in the Preferred Options Consultation Document. The HRA concludes that:

*In summary, none of the Preferred Options allocations will have significant effects alone due to their small size, the habitats affected, the absence of impact pathways, and their distance from the nearest European sites, with the possible exception of the following:*

- One allocation within 500m of a European site (Land North of South Woodham Ferrers)
- Allocations that may affect 'functionally linked land' (FLL) associated with some sites

*The vast majority of the planning policies contained in the Preferred Options Local Plan are categorised as 'no effect' or 'no significant effect' policies. However, the following policies are explored further through appropriate assessment: S6 Housing and Employment Requirements; S7 The Spatial Strategy; and Allocation policies.*

### 1.4 This Feedback Report

This report provides a record of the responses provided on the IIA Report and associated HRA. The responses will be taken into account by the Council in preparing the next stage of the Local Plan Review and undertaking the IIA and associated HRA.

## 2. Consultation Review

### 2.1 Responses

A total of 48 respondents provided comments on the Preferred Options Consultation Document IIA Report. **Table 2.1** provides a breakdown of the type and number of respondents.

**Table 2.1 Type and Number of Respondents**

Type of Respondent	Number of Respondents*
Parish/Town Councils or adjoining Local Authorities	3

<sup>6</sup> Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

Developers or Representatives	34
Other Agencies and Authorities	4
Members of the Public	7

## 2.2 Schedule of Responses to the Integrated Impact Assessment Report

### Main Issues Raised

The main issues raised by respondents with regard to the IIA Report and associated HRA Assessment concern:

- Support for the IIA and its analysis.
- Objections to specific proposed strategic site allocations in respect of key sustainability criteria.
- Lack of justification for the proposed allocations, particularly in respect of the use of evidence.
- Specific site-related constraints which invalidate choice of a specific site.
- Questioning the scoring by the IIA for specific indicators and how mitigation measures will be applied.
- The presence of alternative spatial options which are deemed more sustainable, consequently invalidating the choice of preferred allocations.
- Lack of a comprehensive Green Belt review undermines the IIA because a full range of alternative strategic options have not been presented.
- Lack of consideration of the availability and capacity of community infrastructure.
- Uncertainties recorded by the IIA undermine of the overall analysis and conclusions on site sustainability.
- Failure to present and appraise a sufficient range of reasonable alternatives and/or specific alternative sites and site options not considered.
- The need to ensure that appropriate green infrastructure standards are applied as part of site development.
- The need for HRA-related matters to be fully reflected in plan policies.
- The need to include an Executive Summary in the HRA.
- No specific comments were made on either the HIA or the EqIA.

**Table 2.2** sets out a schedule of the responses received to the IIA Report and the response/action to the points being made.

**Table 2.2 Consultation Response Summary**

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
<b>POIIA1</b>	Patricia Stewart	Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm)	<p>The proposal to development Hammonds Farm involves enormous loss of an extremely rural area which has no infrastructure suitable for an estate of homes.</p> <p>A substantial new road will cross the designated Chelmer and Blackwater conservation area.</p> <p>The traffic implications both for the A12 and for local roads are significant with no properly developed proposals for effective mitigation.</p> <p>Loss of quality agricultural land which should be preserved and used for farming.</p> <p>The previous consultation involving 5 possible approaches each designed to support 8000 homes, every one of those approaches involved at least 3000 houses in North East Chelmsford and at least 1000 houses on brownfield sites in your catchment. The current land for 3862 houses, so you can allocate the necessary land without any need either to breach the natural eastern limit of Chelmsford City's development, or to despoil an important area of countryside.</p>	<p>Objection to the Preferred Option at Hammonds Farm is noted.</p> <p>The IIA Report assessed the option across a range of criteria, including loss of greenfield land and potential traffic implications.</p> <p>The logic of the relationship between the options presented in the Issues and Options Document and that presented in the Preferred Options Document is explained in the latter document, reflecting the availability of additional evidence base work and the consideration of the mix of spatial options which can meet housing and employment requirements.</p> <p>No change to the IIA.</p>
<b>POIIA5</b>	Andrew Stewart	Growth Site Policy 11c Land West of Barbrook Way	<p>Our house is listed as being in a flood risk area. It is subject to flooding from Bicknacre Brook and from Sewage discharge because the pumping station in Five Acres has insufficient capacity to cope with the existing loads. We understand that there are no plans to upgrade or replace the pumping station or increasing the capacity of Bicknacre Brook. This new housing development will exacerbate both surface and drainage issues increase the risk of flooding in Blenheim Close and 5 Acres and should therefore be rejected until the existing shortfall in the capacity of the brook and the pumping station are resolved.</p>	<p>This is a matter for detailed consideration in respect of site-level Flood Risk Assessment.</p> <p>No change to the IIA.</p>
<b>POIIA2</b>	Mandy Hessing	Strategic Growth Site Policy 16a – East Chelmsford Garden	<p>Flooding Issues The Chelmer Valley and Hammonds Farm have notorious flood problems. These will be exacerbated anyway under Climate Change conditions. The existing Church Road Boreham regularly floods now. Your proposed new road will displace flooding to make that worse. I'm guessing you expect worse flooding in the future in central Chelmsford, demanding more water be urgently displaced from there to Little Baddow. The water level through Papermill Lock and surrounding roads causes issues when they flood causing road</p>	<p>Objection to the Preferred Option at Hammonds Farm is noted.</p> <p>Matters associated with potential flood risk and traffic congestion are noted in the IIA, based on technical evidence</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
		Community (Hammonds Farm)	<p>closures. Water displacement will make this worse. I can find no document that shows you have properly reviewed this risk. Presumably a development of this size will require either a much-enlarged sewerage facility, or a new one. How will you stop that from being flooded, or overspilling with Climate Change storms into the Chelmer and Blackwater, causing wildlife and environmental damage to a beautiful, rural, Conservation Area? Water runoff from housing and associated infrastructure is far faster and greater in character than from a farm. Where is the proper review BEFORE you picked your preferred option showing that these different factors have all been given proper, in-depth assessment? The development at Hammonds Farm would undoubtedly exacerbate existing traffic congestion issues in Little Baddow and surrounding areas. The influx of residents and vehicles would strain local infrastructure, leading to longer commute times, increased accidents, and decreased quality of life for residents. Moreover, the narrow roads and limited public transportation options in the area are ill-equipped to handle the anticipated surge in traffic volume, further aggravating the problem. Your Integrated impact statement says: Integrated impact statement says 5.6.15 The site at Hammonds Farm was previously discounted as a reasonable alternative as part of the preparation of the Adopted Local Plan in favour of alternative sites to the north and west of Chelmsford which exhibited better performance in respect of landscape historic environment , flood risk, Traffic generation and local road congestion. 5.6.19 Whilst the development of St Giles. Moor Hall Lane would involve the reuse of brownfield land, all of the proposed site allocations in Growth Area 3 have been assessed as having a significant negative effect on land use (IIA OBJECTIVE 7) use to the loss of greenfield land including grade 3 agricultural land. 5.6.20 Owing to their close proximity to waterbodies, Hammonds Farm, North of South Woodham Ferrers and Saint Giles, Moor Hall Lane have been assessed as having a significant negative effect on water (IIA Objective 8). Hammonds Farm and North of South Woodham Ferrers have also been assessed as having a significant negative effect on flood risk (IIA Objective 9) as the sites include land within Flood Zones 2 and 3. As noted above, however, it is anticipated that potential effects on water and flood risk could be lessened through the application of the proposed Local Plan policies and at the individual planning application stage. (nothing in the documents to suggest this has been looked at) 5.6.21 Sites at Hammonds Farm and North of South Woodham Ferrers have been assessed as having a significant negative effect on cultural heritage (IIA Objective 13) and landscape and townscape (IIA Objective 14). Both developments would constitute substantial extensions with potential impacts on landscape and townscape character and the setting heritage assets in close proximity to the sites. As noted above, however, the Preferred Options Consultation Document contains proposed policies which seek to minimise the adverse effects of development on the historic environment and landscape and townscape (see Section 5.5), the implementation of which is expected to help reduce the Potential significance adverse effects on these IIA objectives. Nothing has Changed</p>	<p>available at the time of assessment and subject to further detailed scrutiny. Flood risk and traffic issued are identified in the IIA as matters of concern. Flood Risk is recorded as a Significant Negative/Uncertain reflecting proximity to a water course and presence of Flood Zones 2 and 3. However, the policy requires the use of flood mitigation measures which should help maintain water quality and minimise flood risk. No significant effects are therefore anticipated.</p> <p>Transport is recorded as a Significant Positive/Minor Negative, reflecting traffic generation but the requirement of the policy for measures to enable travel by sustainable modes (including walking and cycling) and improvements to the local road network (supported by a traffic management strategy).</p> <p>CCC assessment of the proposed allocation states: <i>“The site will accommodate a new Garden Community for housing and employment development, a country park, areas for SUDS, biodiversity and recreation, and provide active and sustainable modes of transport to key destinations. Complies well with Strategic Priorities, Vision, Spatial Principles and Spatial Strategy in particular by providing a mixed and balanced new self-contained community. Supported by the Plan evidence base e.g. Heritage</i></p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
				<p><i>Assessment 2024. There are no overriding constraints that would hinder the delivery of the site which will significantly contribute to housing and employment supply. It is viable and available with no overriding physical constraints to bringing forward the allocation in this location.”</i></p> <p>No change to the IIA.</p>
POIIA7	Pigeon (Sandon) Ltd	Section 5.4 Table 5.3 Paragraph 5.4.5 Paragraph 5.4.6 Section 5.5 Paragraph 5.5.4 Paragraph 5.5.17	<p>The Council has prepared a Sustainability Appraisal in accordance with Section 19(5) of the Planning and Compulsory Purchase Act 2024 and the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. This has been published in the form of an Integrated Impact Assessment (IIA) prepared by WSP. Section 5 of the IIA sets out the assessment of likely effects of the PODLP against the objectives that comprise the Assessment Framework (section X of the IIA). Section 5.4 of the IIA assess the likely impacts of the proposed approach to the Employment Land Requirement. This is shown in Table 5.3 of the Assessment, an extract is copied below. The Employment Land Requirement is anticipated to have a significant positive effect on the economy (Objective 3). This is supported by Pigeon in which Land adjacent to A12, Junction 18 as a strategic employment site forms part of the overall employment land requirement and thus will contribute towards significant positive effects on the economy. Whilst there are no significant negative effects identified, paragraph 5.4.5 of the IIA does note that negative (and uncertain) effects have been identified across a range of the Assessment Objectives associated with biodiversity, transport, air quality, climate change and waste and natural resources, reflecting increases in trends such as commuting, new infrastructure requirements and emissions associated with HGV's. Whilst further consideration will be given to these once development management policies are developed and considerations such as site location, design and mitigation measures of development are better understood, we would disagree with the assessment against these objectives. With biodiversity, the introduction of the 10% statutory requirement for BNG will guarantee beyond any doubt the overall improvement in biodiversity across Chelmsford as a result of new employment floorspace delivered through new sites, allocations and growth areas. The 10% is a minimum requirement, with the potential for sites to deliver in excess of 10%, with the garden communities expected to deliver 20%. As such, the delivery of new employment sites will inevitably result in a positive effect on biodiversity. As for the impact on the other Objectives referenced, any potential negative impacts arising from commuter trends and HGV movements can all be appropriately managed through the</p>	<p>Support for the overall conclusions of the IIA on Land adjacent to A12, Junction 18 is noted.</p> <p>The assessments are made in respect of specific aspects of the site option (biodiversity, transport, air quality, climate change and waste and natural resources and new infrastructure requirements) are made in light of available evidence, and, as noted the requirements of Development Management Policies, which will implement mitigation in response to the detailed plans submitted by site proposers.</p> <p>The role of the IIA is to present an assessment of likely effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance and in respect of individual measures.</p> <p>Comments on alternative scoring are welcome and will be reviewed as part of</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			<p>development management process where planning applications are made for proposed employment site allocations to come forward in order to meet the Employment Land Requirement. Possible negative impacts can be mitigated against during both the construction and operational phases of development through Construction and Environmental Management Plans which can be secured by planning condition or the submission and approval of technical assessments setting out recommendations to negate any negative impacts during the lifetime of a planning application. As such, the Employment Land Requirement will have a neutral effect against these Objectives. Paragraph 5.4.5 goes onto note that there is potential for new employment uses to deliver benefits in respect of, for example, sustainable travel, health and enhancements to townscapes. This is supported and could therefore be reflected as uncertain positive effects. Pigeon supports the assessment as discussed at paragraph 5.4.6 with regards to sustainable living and health well-being, reflecting the opportunities for the provision of local employment opportunities associated with the revitalisation of urban areas. This however will also extend to new strategic sites such as Land adjacent A12, Junction 18 that have the potential to maximise opportunities for sustainable and active travel as well as public transport through promotion of the Sandon Park and Ride. The Assessment identifies mixed effects to land use, cultural heritage and landscape/townscape reflecting the potential compromises to be made in allocating development, but also opportunities for the protection and enhancement of these resources. Pigeon considers by virtue of new employment development being able to preserve and enhance such resources through the development process this should either be assessed as neutral or minor (uncertain) positive effects. Section 5.5 assesses the Preferred Spatial Strategy. Table 5.5 summarises the appraisal of the Preferred Development Requirements and Spatial Strategy, the cumulative effects of the spatial strategy are discussed at paragraphs 5.5.4 of the IIA, combining the preferred housing/Gypsy traveller and travelling showpeople requirement, preferred Employment Land Requirement and preferred spatial strategy. Notwithstanding the assessed effects of the housing requirement against the Objectives and Pigeon's views on the Employment Land Requirement, overall, the cumulative effects are predominantly positive, with mixed effects against several Objectives and one minor negative. Pigeon supports the significant positive cumulative effects with regards to urban renaissance, health and wellbeing and transport. Significant negative effects have been identified in respect of land use owing to the loss of greenfield and varying grades of agricultural land. Recognising that there are insufficient sites and land within the Chelmsford Urban Area to meet the development land requirements for Chelmsford over the Plan period, there is a necessary release of greenfield land in order to meet these requirements. As such, this should be a neutral cumulative effect. A cumulative negative effect has been identified for waste and resource use as a result of new development. However, this is at odds with several of the strategic policies and development management</p>	<p>the preparation of the Pre-Submission IIA.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			<p>policies in the Local Plan, in which sustainability and addressing climate change are priorities with new development expected to demonstrate how matters such as waste and resource use can be managed sustainably. These should be identified as neutral cumulative effects. The preferred development requirements and Spatial Strategy have been assessed as having cumulative mixed positive and negative effects on the remaining IIA Objectives. Paragraph 5.5.17 notes in particular that 'growth in the City Area is likely to have a range of adverse environmental and social effects during both the construction and operation of new development and arising from, for example, land take, disturbance (e.g. noise), recreational pressure (in respect of nature conservation sites), increased vehicle movements and associated emissions to air, the use of energy and resources, and impacts on landscape and townscape character.' As previously discussed, such effects can and will be managed through the development management process to ensure that the effects arising from both the construction and operational phases of new development do not result in any negative social or environmental effects.</p>	
<b>POIIA4</b>	Alan Brunning	South Woodham Ferrers	<p>The local plan for South Woodham Ferrers, area 10 is basically the same as that outline in planning application 21/01961/out. It provides nothing new and contains no enhancements or alterations despite the 168 comments from the public including a technical report from SCP (page13 Technical note SCP/210231/TN01 that can be viewed under 'Plans and Document' tab 16 December 2022POIIA) the majority of the public and the SCP analysis state that the road models cannot be relied upon. The VISSIM model does not account for all development current and future and through traffic from the east (The Dengie) despite assurances from Essex Highways experts (Ringway Jacobs) that it is accurate. The major Highways issue are</p> <ul style="list-style-type: none"> <li>• through traffic will divert and use Ferrers Road as the preferred to and from the A130 which will gridlock town traffic to the south of the road</li> <li>• The B1012 will be slowed by the addition of 5 pedestrian controlled crossing as people seek to gain access to the south of the town</li> <li>• Additional peak hour traffic lights on the A132, B1012 and Ferrers Road</li> <li>• The congestion caused on the B1012 will cause pollution at the playground of Woodville School</li> <li>• A new traffic survey of traffic on the B1012 and A132 is required with full public access of the results.</li> </ul>	<p>This is a detailed highways related matter to be dealt with through the Local Plan evidence base.</p> <p>No change to the IIA.</p>
<b>POIIA9</b>	Wates Developments and Hammonds Estates LLP	Strategic Growth Site Policy 16a – East Chelmsford Garden Community	<p>The selection of the Spatial Strategy is considered to be well evidenced in the Preferred Option Integrated Impact Assessment, which has been updated from the previous iteration at Issues and Options stage as more technical work and analysis has become available. Furthermore, we consider that its findings are well-founded due to the council's experience of the planning and technical considerations involved in bringing forward strategic site allocations such as the North East Chelmsford Garden Community. Section 5.3 – Selection of the Housing Requirement At Section 5.3, we support the assessment of the council's</p>	<p>The broad support for the current iteration of the IIA is noted.</p> <p>Comments on alternative scoring are welcome and will be reviewed as part of the preparation of the Pre-Submission IIA.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
		(Hammonds Farm)	<p>selected Housing Requirement, and at Paragraphs 5.5.18-5.5.31 the reasons for its selection compared to reasonable alternatives. In particular, we agree with Paragraph 5.5.27 that to plan for only the minimum Standard Method would impact on the council's ability to meet housing needs of specific groups, including delivering the amount of affordable housing, and that this would fail to reflect the council's policy objectives. Section 5.5 – Assessment of the Preferred Spatial Strategy We consider that the narrative provided in Paragraph 5.5.39 to 5.5.57 provides sound justification for the selection of the Preferred Spatial Strategy. At Paragraph 5.5.78, the Spatial Strategy is demonstrated to perform better than the five Spatial Approaches tested at the Issues and Options stages, which continue to stand robustly as reasonable alternatives to the selected strategy. We agree with Paragraph 5.5.59 that although the preferred Spatial Strategy is a hybrid of Spatial Approaches A to E, it most resembles Spatial Approaches A and B by focusing development in and close to the Urban Areas and Key Service Settlements outside of the Green Belt, whilst also including the proposed allocation of a new garden community. Spatial Approach E, which included Hammonds Farm at Issues and Options stage, was previously assessed as a 'New Settlement' (and in transport terms was noted as being assessed without consideration of mitigating infrastructure). The Preferred Option Site Allocation 16a conceptualises the site as a new Garden Community of Chelmsford, which by virtue of its connectedness to the existing urban area and infrastructure provision, is seen to be closely related to the nature of sites previously included in Spatial Approaches A and B. There is therefore a logical progression in the assessment process from the Issues and Options stage to the selection of the Preferred Option. We also note that the potential effects identified in the earlier Spatial Approaches were broadly similar (mixed positive and negative), and the council's decision-making in drawing upon aspects of the five approaches in combination to derive the Preferred Spatial Strategy (Paragraph 5.5.42-3) is supported. As a result, we support the selection of the Preferred Spatial Strategy over the earlier Spatial Approaches, and consider that the selection is well supported by evidence and justified. The reasons for the rejection of the Alternative Sites and Site Clusters by Location is also well evidenced through Table 5.11 and Appendix G. The balance of positive and negative effects arising from the Spatial Strategy as a whole is well articulated throughout the IIA. We particularly agree with the finding at Paragraph 5.5.17 that "the delivery of strategic scale sustainable urban extensions which follow Garden Community principles, could help to both minimise the adverse effects of development and deliver environmental enhancement by extending the City Area's green infrastructure networks." We accept the finding of Paragraph 5.5.66 in which the "negative (and uncertain) effects identified across a range of IIA objectives reflects the potential for development to result in adverse environmental impacts", but we support the consequent findings that such potential adverse impacts are judged capable of being mitigated through the policies of the Local Plan Review. As a result, the proposed Spatial Strategy therefore</p>	



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			<p>represents sustainable development and is evidenced to be superior to the alternatives considered. Appendix G – Appraisal Of Proposed Site Allocations And Reasonable Alternatives - Strategic Growth Site 16a – East Chelmsford Garden Community (Hammonds Farm) Our comments on the RAG scoring and assessment commentary of Site 16a are provided in the table below, and these comments also apply to the commentary on Hammonds Farm as reported in Paragraphs 5.6.20 to 5.6.22. We note that Paragraph 5.6.22 has an incorrect reference to “significant negative effects” on biodiversity at Hammonds Farm, which conflicts with the site assessment scoring given in Appendix G, as referenced below. Topics: 1. Biodiversity (Score +/-/? ) The Hammonds Farm development will include measures to enhance and protect existing habitats that are present and in close proximity to the site, and to offer a beneficial effect through the significant contribution to Chelmsford’s strategic green infrastructure network. Collectively, the range of new habitats created by the proposed development, including areas of species-rich wildflower grassland, wetlands, woodland, scrub and tree planting, will make a significant contribution to Chelmsford’s strategic green and blue infrastructure network and deliver a significant net gain to biodiversity. This will include new recreation spaces that should deter recreational pressure from occurring within protected sites. Recreational impacts on off-site international designations are further mitigated in full through developer contributions to the Essex Coast Recreational disturbance Avoidance &amp; Mitigation Strategy (RAMS). Therefore, negative effects are capable of being avoided and managed by the policies within the Plan, and we disagree with the negative scoring and consider that this should be positive or neutral. 2. Housing (Score ++) Supported 3. Economy (Score: ++) Supported 4. Sustainable Living and Revitalisation (Score: ++/? ) Supported 5. Health and Wellbeing (Score: ++/? ) Supported 6. Transport (Score ++/-) Supported 7. Land Use (Score: - -) Like all other strategic site allocations in the Chelmsford area, housing development will result in the inevitable loss of agricultural land, so it is not considered that this scoring could change. 8. Water (Score - - /?) We strongly disagree with this scoring. The presence of watercourses within the site does not equate to the likely existence of significant negative effects. Development will be based around a strategic SuDS system, with the use of nature-based solutions alongside new technology to reduce the use of storm overflows and address flood management and water quality. The close proximity of the site to Chelmsford Water Recycling Centre will support statutory plans for the upgrade of this facility as identified through long term investment plans to 2050, which has the potential to improve river water quality, whilst mitigating the need for an additional treatment works. This scoring should be positive or neutral. 9. Flood Risk (Score: - - / ? ) We strongly disagree with this scoring. The presence of Flood Zones 2 and 3 within the site boundary does not equate to the likely existence of significant negative effects. As discussed elsewhere in these representations, the full site boundary includes around 50% green infrastructure, but the Site Allocation 16a policy map has erroneously included some</p>	

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			<p>'development area' within Flood Zones 2 and 3, and the council's Flood Exception Test has been undertaken on this basis. Instead, the proposal for Hammonds Farm is that all development and uses will be located 100% within Flood Zone 1. Within the wider site, the restoration of semi-natural landscapes from arable, is capable of providing flood betterment along the Chelmer to reduce flooding in the locality. The masterplan also proposes a spine road to join the development to Junction 19, which will need to pass through Flood Zones 2 and 3 and bridge the river Chelmer. These structures will consider potential flood impacts within their design, and will be optimized to both maintain any existing overland flow paths to minimize flood impacts, and design any road supports to reduce any flood volume displacement. The holistic topographic design of the site will play the largest part of any mitigation of flood impact. In the western parts of the site where the country park is planned, it is expected that the levels of the site will be reprofiled and lowered, where required, to provide compensatory flood storage, which will assist in being able to influence flood contours, and fully protect against flood risk. In order to ensure that flooding is not worsened either on the site or off site, a full flood model of the site is planned to be undertaken. As the design is progressed, a full analysis will be undertaken to assess the impacts on current flood levels, and where necessary compensatory flood storage will be designed, integrated and delivered as part of the scheme to offset any potential flooding. The council's SFRA and Exception Test demonstrates that the site is suitable for allocation. We therefore consider that the scoring should be positive or neutral. 10. Air Quality (Score 0) Support this scoring 11. Climate Change (Score - ) Support this scoring as it aligns with the approach to all sites and is therefore neutral in the assessment. 12. Waste and Natural Resources (Score: - / ?) Support this scoring. 13. Cultural Heritage (Score: - - / ?) We challenge this scoring on the basis that whilst there may be some effects on heritage, these are unlikely to be significant due to the use of sensitive masterplan design and mitigation measures, as secured by the specific wording of the site allocation policy. A Heritage Appraisal has been submitted in support of these representations, containing evidence that heritage impacts will be low to moderate, with significant scope for design mitigation. 14. Landscape and Townscape (Score: - - / ?) We challenge this scoring on the basis that whilst there will be effects to landscape as a result of development, it is uncertain whether they will be significant, due to masterplan layout design and the use of strategic mitigation planting measures. A landscape assessment has been submitted, which provides evidence that will form the basis for the development of these measures. Overall, we strongly support the finding of the IIA, and support the reasoning provided in the table at Page 512 of the IIA for the selection of East Chelmsford Garden Community (Hammonds Farm). In general, we note that the pattern of effects arising at Hammonds Farm is similar to that as assessed at the adopted Strategic Growth Site 6: North-East Chelmsford Garden Community. This supports the findings of assessments undertaken at the last Local Plan stage, when Hammonds Farm was assessed</p>	

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			<p>as a reasonable alternative, with the Local Plan Inspector's Report of February 2020 "that the Preferred Strategy performed 'similar to, or better than, the reasonable alternatives considered'. There is therefore a consistent pattern of sustainability appraisal findings over a considerable period of time that Hammonds Farm has been similar in its merits and status to the North-East Chelmsford Garden Community, as acknowledged by the Planning Inspector. The IIA demonstrates that the Spatial Strategy is well justified by evidence and is robust, in accordance with the NPPF.</p>	
<b>POIIA3</b>	Keith Ferguson	Section 5.5	<p>I wish to register a strong objection to your proposal to approve Hammonds Farm as your preferred option for the development of 3000 houses and 43000sqm of "employment space". Your proposal is fundamentally without proper foundation, and it is inadequately developed. You have failed in my view to analyse other available options on a comparative basis. Instead you have produced a preferred option and then only delivered documentation designed to support that option. Most importantly, however, your justification for that option is flawed. I must now justify these claims. Let me say at the outset that there is no challenge to your need to provide land for 3862 houses. The only question is where they should be located within your catchment. When, in Autumn 2023, you provided a Consultation on 5 possible "Approaches" to what was then perceived to be a need for 8000 houses, every one of those "Approaches" assumed that a minimum of 3000 houses would be located within North East Chelmsford, in or around what we know as Beaulieu. A further minimum of 1000 houses was also foreseen in every case to be located on brownfield sites. All of your decision-making, including decisions about the need for infrastructure in the vicinity of allocated sites, was on the basis that it was perfectly possible to deliver housing in those locations at those levels. Since then, nothing of relevance has changed (I will come back to this). At that time, you needed to provide a minimum of a further 4000 houses on additional greenfield sites, and it was reasonable to look at a variety of options for the excess including Hammonds Farm to assess their comparative merits. You no longer need to do this. Therefore, given that you now need only 3862 houses (thus achievable within that committed in every possibility of the Autumn consultation) you need to provide a full, comparative justification of any decision to look beyond North East Chelmsford and brownfield sites. I submit that you have not done so. I say this because although there is an Impact Assessment of the implications (especially the Highways implications) of developing Hammonds Farm I cannot find any similar assessment of the relative implications of these other sites.</p>	<p>The objection to the proposed allocation at Hammonds Farm is noted. Throughout the plan preparation process, the identified housing need and the various site options which could meet that need have been clearly presented and subject to appraisal through the Integrated Impact Assessment.</p> <p>The greenfield land requirement has increased in line with the recalculation of the housing requirement and the sites which can meet this. Alternative sites of a similar capacity were not identified.</p> <p>Transport is recorded as a Significant Positive/Minor Negative, reflecting traffic generation but also the requirement of the policy for measures to enable travel by sustainable modes (including walking and cycling) and improvements to the local road network (supported by a traffic management strategy).</p> <p>No change to the IIA.</p>

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POIIA8	Vistry Group	Green Belt	<p>We note that the Review of the Adopted Chelmsford Local Plan – Preferred Options Integrated Impact Assessment document (the IIA) produced on behalf of the City Council by WSP, assesses the following aspects of sustainable development: • Sustainability Appraisal • Strategic Environmental Assessment • Habitats Regulations Assessment • Health Impact Assessment • Equality Impact Assessment Our Client has a long-standing interest in both Land at Skeggs Farm, Chelmsford and Land South of Writtle, which was previously promoted when the Council was preparing the now adopted Local Plan (SHELAA refs. CFS113, CFS129, 17SLAA13 and 21SHELAA98). Despite performing better with respect to the overall sustainability criteria within the SLAA assessments than comparable sites that were ultimately identified in the Local Plan as allocations, our Client's sites were discounted at an early stage of the plan making process when the Council decided not to review the Green Belt boundaries within Chelmsford. Please see our separate site-specific submissions in respect of these two sites. Our Issues and Options representations and Call for Sites submissions highlighted the importance of the City Council taking the opportunity to oversee the preparation of a Green Belt Review as part of the key evidence base work that will underpin its new Local Plan. The Metropolitan Green Belt covers almost 34% of land within the administrative area of Chelmsford and is located to the south and west of the City. This Green Belt was drawn several miles wide around London and represents an entirely arbitrary boundary in relation to Chelmsford, with part of the administrative area in, and part out. It is therefore a restrictive policy that has no connection to Chelmsford but has heavily influenced the growth of the City in a northern direction beyond the Green Belt and will continue to do so through allocated sites in the adopted Local Plan. It is also important to note that the vast majority of Green Belt boundaries in Chelmsford were drawn up in the 1950's and have not been fundamentally reviewed since. No substantive assessment of Green Belt sites has ever been undertaken by the Council. We consider that it is important to recognise that with Green Belt covering just over a third of the entire Authority area, it is vital that the Council assesses through the Local Plan Review whether this designation remains appropriate, or whether some sites could sustainably be brought forward for development without causing any overall harm to the Green Belt were exceptional circumstances to exist to justify removing land from the Green Belt. We consider that this issue is particularly acute in relation to the Green Belt boundaries on the western edges of Chelmsford, where opportunities exist to facilitate the delivery of key infrastructure of corporate importance, which would help to alleviate flood risk in Chelmsford City Centre and at Writtle. It is an important principle, accepted by many Inspectors examining plans, that even where exceptional circumstances can be demonstrated to remove land from the Green Belt, only those sites that can deliver sustainable development would be suitable. With respect to the scope of the IIA, Green Belt is a policy designation, rather than a sustainability designation, which has its own defined purposes and is considered separately to the Sustainability Appraisal process. We therefore</p>	<p>Comment noted.</p> <p>A Green Belt Review has not been completed as part of the Local Plan Review, reflecting the spatial principle of Protecting the Green Belt. The IIA considers spatial approaches which have been prepared as part of taking into account the spatial principle of not amending Green Belt boundaries as part of the Local Plan Review.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. It would also undermine the protection of the Green Belt by national planning policy. This approach has therefore been rejected by the Council.</p> <p>In the context, the IIA has considered reasonable options (i.e. those which have been developed in light of available evidence, spatial planning requirements and plan strategy).</p> <p>No change to the IIA.</p>

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			<p>note and agree with the commentary in Appendix C of the IIA Report which states: “The IIA Framework does not assess options based on whether or not sites are in the Green Belt and it is proposed to maintain this approach. The framework provides the basis for identifying whether or not the Review of the Adopted Local Plan is consistent with the NPPF, e.g. through promotion of higher densities in centres.” We strongly concur with the content of paragraph 3.2.4 of the IIA, which states that the “Chelmsford City Area has a large number of key strengths, not least its good connectivity to London, a strong economy boasting particular strengths in the financial and business services sectors and ready access to the countryside”. However, it recognises that there are also issues which need to be addressed to ensure the area’s long-term sustainability including, in particular, a rapidly growing population, pockets of deprivation, high commuting levels and environmental constraints including Green Belt and flood risk. We also note the content of paragraph 3.8.14, which specifies that the 2017 Strategic Flood Risk Assessment (SFRA) for the Chelmsford City Area highlights that Chelmsford has historically been subject to flooding from several sources of flood risk. The primary fluvial flood risk is associated with the River Chelmer and its tributaries. The main urban area at risk is Chelmsford City. Other areas that are shown to be at risk include Margaretting, Bicknacre and Writtle. Consequently, we consider that the lack of a Green Belt Review to consider site boundaries on the edges of Chelmsford will result in sites that are less sustainable outside of the Green Belt coming forward, which is not a sound approach to plan making. Chelmsford’s neighbouring authorities with land within the Green Belt have acknowledged this by carrying out their own Green Belt Reviews in recent years. We would welcome further engagement with the Council as part of the Local Plan Review and we strongly urge that the City Council commits to overseeing the preparation of a Green Belt Review Study. We consider that it is crucial for it to have up-to-date evidence available in order to demonstrate that sites still merit Green Belt status, and indeed, whether other sites currently excluded from this designation, now merit Green Belt Status. Whilst we fully recognise that the current Government’s recent planning reforms do not require the Council to undertake such a review, we would highlight the risks to the progression of the Emerging Plan should no such review be undertaken. In particular, we would point to the potential risks associated with the City Council’s current approach given the likelihood of a Labour Government being in place before the Plan is submitted to the Secretary of State for Examination, given that the Party is on public record as advocating both higher housing target figures and the release of more Green Belt land for development. Labour has set out plans for building on the Green Belt to boost housing supply while improving “green spaces”. Under new “golden rules,” Councils are expected to be required to prioritise building on brownfield sites and poor-quality areas in the Green Belt, dubbed “Grey Belt”. Labour has said that it is committed to a “brownfield-first” approach but would loosen planning laws and create a new class of “Grey Belt” land for low-quality Green Belt areas. The party has</p>	

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			<p>previously pledged to override planning rules and local MPs to build 1.5 million homes within 5-years. Whereas the Conservative Party's 2024 Election Manifesto now commits to building 1.6 million homes in the same period. If either of these figures are to be achieved by necessity there will need to be a step-change in housing delivery. Labour plans an affordable housing boost. It has suggested that at least 50% of housing development on this category of sites must be considered affordable. It has also referred to the "housing emergency" that is "engulfing a generation of hard-working aspirational people", and that it would "get tough on the blockers". The most recent annual housing supply figures published show the government has been missing its target figure of 300,000 homes a year. In 2022-23, just over 210,000 new homes were built across the UK, an increase of 5,000 from the previous year. The Labour Party leader is on record as stating that "Labour supports brownfield-first policies. But we must be honest, we cannot build the homes Britain needs without also releasing some land currently classed as Green Belt. Our golden rules will also ensure any grey belt development delivers affordable homes, new infrastructure and improved green spaces. Last year, the Chair of Natural England also publicly stated that building on the Green Belt "should be part of the UK's answer to the housing crisis". We note that Appendix B: Schedule of Scoping Report Consultation Representations and Responses Actions refers on page 234 to our earlier representation in respect of the content of the draft IIA and states in response to our call for a Green Belt Review that "This issue is not for the IIA to determine". We will note that page 253 goes on to state that "A partial Green Belt Review has not been completed as part of the Local Plan Review, reflecting the spatial principle of Protecting the Green Belt. The IIA considers spatial approaches which have been prepared as part of taking into account the agreed Green Belt spatial principle". We agree that it is a Green Belt Review is ultimately not a matter for the IIA to determine and is down to the local authority to decide. However, we do believe that the IIA needs to address and comment upon the implications of not undertaking a Green Belt Review and identifying potential highly sustainable Green Belt Releases on the edge of, or close to, Chelmsford City. With regard to this, we would highlight Table NTS4 IIA Objectives and Strategic Priorities Compatibility Matrix. In particular, we would highlight both Objective 4. Ensuring sustainable patterns of development and protecting the Green Belt and Objective 11. Climate Change: To minimise greenhouse gas emissions and adapt to the effects of climate change. Consequently, we consider that the IIA is seriously deficient in that it fails to address the incompatibility of paragraphs 5.5.82- 5.5.85 (Development growth in the Green Belt) and paragraphs 5.5.86- 5.5.89 (Development growth in the Green Wedge) with the aforementioned objectives given the absence of any Green Belt Review to justify and underpin a development strategy that will result in a very significant amount of new development being located in locations away from the city of Chelmsford and where greater patterns of travel will be required. Furthermore, in the context of a potentially significantly changing national policy framework, we would reiterate the pitfalls of prematurely</p>	

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			excluding highly sustainable sites without reassessing their Green Belt and Green Wedge status, whilst instead being heavily reliant upon growth options that will deliver new development beyond the Green Belt and away from the city of Chelmsford itself, where facilities and services are concentrated. Thus, promoting additional travel.	
POIIA10	The Cathedral School	Sites 1a, 1d, 1x, 1y, 1z	The Local Plan Review highlights the need to support housing growth with adequate infrastructure, including educational facilities. However, the specific impact on existing schools, like ours in central Chelmsford, seems to have been inadequately addressed. This is particularly concerning given the limited space and unique inner-city location of our site. This oversight could significantly affect the quality of education and the well-being of the community. What plans are proposed for existing schools in the area to meet the anticipated increase in demand due to residential expansion?	The provision and capacity of appropriate infrastructure such as educational establishments is a matter for the local education authority in conjunction with CCC to ensure that adequate provision is made as part of new development. Such matters are part of the evidence base, site policies and development management policies.  No change to the IIA.
POIIA15	Historic England	Appendix G	To support its proposed sites, the Council has published its 'Integrated Impact Assessment,' dated May 2024. While we welcome this document, we note that it has concluded uncertain negative effects or uncertain effects for several of the new sites. Given these uncertainties, it is unclear what information has been used to inform the heritage considerations that led to the identification of these new sites in the Plan. As the Plan develops, we expect more detailed analysis, informed by Heritage Impact Assessments (HIA), to help differentiate between sites.	Heritage Impact Assessments (HIA) are a requirement of detailed site development pertaining to potential archaeological material. Recognised sources have been used to inform the IIA at a high level. HIAs for all new sites proposed within the PO LP have been undertaken and published alongside the PO consultation.  No change to the IIA.
POIIA12	The Danbury Society	Section 4.4	Under the section related to difficulties encountered in undertaking the assessment, those uncertainties and assumptions are listed. • The design and layout of the proposed allocations is not known at this stage. • The extent to which job creation is locally significant will depend on the type of jobs created (in the context of the local labour market) and the recruitment policies of prospective employers. • The level of investment in Community facilities and services that may be stimulated by new development is uncertain at this stage and will in part be dependent upon the policies of the Local Plan, site specific policies and viability. • The exact scale of greenhouse gas emissions associated with Local Plan approaches will be	The uncertainties raised are standard topics to be addressed through site design and the application of strategic, site and development management policies, applied to a specific proposal for development.  No change to the IIA.

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			<p>dependent on a number of factors including: the exact design of new development; future travel patterns and trends; technological changes; individual energy consumption behaviour; and the extent to which energy supply has been decarbonised over the plan period. • The exact scale of waste generated will be dependent on a number of factors including: the design of new development; waste collection and disposal regimes; and individual behaviour with regard to recycling and reuse. • The speed, scale and behavioural implications (such as patterns of work and commuting) associated with the recovery from the Covid-19 pandemic. ASSUMPTIONS • It is assumed that greenfield land will be required to accommodate some of the future growth over the plan period • It is assumed that new development would not be located on land designated for nature conservation. • It is assumed that the Council will liaise with Essex and Suffolk Water with regard to infrastructure requirements for future development. • Measures contained in the Essex and Suffolk Water's Water Resources Management Plan would be expected to help ensure that future water resource demands are met. • There will be no development that will require diversion or modification of existing watercourses. However, if such measures are required, this could affect local water quality. • It is assumed that, where appropriate, development proposals would be accompanied by a Flood Risk Assessment (FRA) and that suitable flood alleviation measures would be incorporated into the design of new development where necessary to minimise flood risk. • It is assumed that the Essex Waste Local Plan will make provision to accommodate additional waste associated with growth in the Chelmsford City Area. It is difficult to understand how, with so many uncertainties and unknowns that a decision to include a previously unsustainable site as a primary and preferred location for future development has been arrived at? From the Integrated Impact assessment it is clear that potential mitigation and enhancement measures are at present unknown.</p>	
<b>POIIA16</b>	Richborough	Para 5.6.19; Section 10	<p>CCC have proposed East Chelmsford Garden Community for the delivery of 3,000 new homes, 43,000sqm employment floorspace and 20 serviced gypsy and traveller pitches. The allocation is also to include a new Country Park, mixed use centres including retail and community uses, schools, nurseries and green infrastructure. The site includes several access related design principles and references the need for National Highways to contribute to the access strategy as there are to be the following works to the A12 and A414: • "Main vehicular access to the site will be from a new junction on the A414 Maldon Road which will need to take account of new access to the employment site 16b - Land Adjacent to Junction 18 of the A12 • Additional access to the site will be from Junction 19 of the A12 (Boreham Interchange), to include a new multi-modal vehicular bridge over the River Chelmer/Chelmer with measures to deter use as a through-route" It is clear that significant strategic highway works are required to gain access to the site and Richborough consider this to be a clear risk to both the timely delivery of the site and the viability of the site, thus jeopardising its delivery</p>	<p>Objection to the allocation of the proposed East Chelmsford Garden Community is noted. Matters of accessibility are the subject of technical studies, both from CCC and site promoters, which have helped to inform the selection and appraisal of options.</p> <p>Throughout the Local Plan Review process, options have been considered on an equal basis to enable comparative performance to be gauged. Uncertainties are</p>



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			<p>at all. At this stage there is no evidence to suggest that the required level of infrastructure, services and amenities proposed as part of the East Chelmsford Garden Community allocation could feasibly or viably accommodate such a large increase in the number of houses and residents. The Call for Sites form (reference: CFS83) also identifies several constraints to the development of the site, including:</p> <ul style="list-style-type: none"> <li>• 25-50% of the site being within Flood Zone 3 – we note that the residential parcels of development are outside of the areas of Flood Zone 3 (mostly the Green Wedge), the Flood Zone 3 land wraps around the site and creates the northern, eastern and western boundaries. It is worth noting that a Sequential Assessment will still need to be undertaken for the site, despite the intention to retain development outside the flood zones.</li> <li>• Impact on heritage assets – there are several Listed Buildings within and in close proximity to the site, including a Grade II* Listed St Mary's Church to the north of the site. The site also falls within the Chelmer and Blackwater Navigation Conservation Area.</li> <li>• Impact on ecological designations – the site is close to Blake's Wood and Lingwood Common SSSI to the east.</li> <li>• Tree Preservation Orders – there is a 10.28ha parcel of the site that is covered by a Tree Preservation Order and therefore will impact on the potential developable area.</li> <li>• Multiple ownerships – the site is in multiple ownerships and therefore constraints associated with land values and timely delivery where existing uses need to be stopped, will impact the ability to start construction of the dwellings.</li> </ul> <p>WSP have prepared an Integrated Impacts Assessment (IIA) which has considered the impacts of the draft allocations. For East Chelmsford Garden Community, significant negative effects have been identified in respect of water, flood risk, cultural heritage, as well as landscape and townscape Objectives. Overall, it is not clear that reasonable alternatives have been satisfactorily identified or assessed. Paragraph 5.6.19 of the IIA seems to rule out other greenfield options on the basis that "all of the proposed site allocations in Growth Area 3 have been assessed as having a significant negative effect on land use (IIA Objective 7) due to the loss of greenfield land including Grade 3 agricultural land". This would be the case for almost any site outside of the settlement boundary, whilst others may not result in the same level of significant effects against other IIA Objectives. Richborough is of the view that a wider range of locations and site sizes should be considered to meet the requirement, particularly within Growth Area 3. Whilst it is acknowledged that the site is to be a Garden Community, and therefore not an SUE to Chelmsford, the site does not present as sustainably located settlement and is significantly detached from Chelmsford by the Green Wedge, River Chelmer and the A12. Section 5.10 of the IIA is titled 'Accessibility Mapping and Appraisal' and provides analysis of the relative accessibility of the 26 settlement areas across the City Area. Whilst the Chelmsford urban area scores 2.81 and KSS's, such as Danbury score 2.01, the East Chelmsford Garden Community achieves only 1.64, the lowest of any settlement. The lack of connectivity with Chelmsford will clearly act as a major constraint to development and one that will incur significant cost to the developer. The</p>	<p>acknowledged, including the understanding that further detailed technical work is likely to be required on matters such as flood risk. Statutory bodies (Natural England, the Environment Agency and Historic England) are invited to comment on both the options and on detailed planning applications.</p> <p>No change to the IIA.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			emerging Policy includes the following criteria: • “Provide safe multi-user access routes under and over the A12 • Provide a new active and sustainable route and bridge over the A12 to connect to Sandon Park and Ride Due to the surrounding areas of Flood Zone 3 and the River Chelmer, the only available locations for crossing the A12 are to the south of the site near to Junction 18 and therefore will require residents to travel the length of the site to cross to travel into Chelmsford, or to turn back on themselves once the site has been exited if travelling north. The feasibility of delivering multiple routes across, under and over the A12, via a bridge does not appear to have been fully tested. Richborough consider there to be too many constraints to the development of the site and that the site is not a suitable location for development given its relative isolation. The deliverability of this site has not been adequately tested and Richborough therefore suggests removing the site from the draft LPRPO, and to be replaced with alternative sites which will ensure the delivery of the Local Plan housing trajectory.	
<b>POIIA14</b>	The Danbury Society	Para. 5.5.61	It is clear that the point (5.5.66) raised in the IIA stating that (text from para. 5.5.61) ” a new large settlement is generally opposed for a wide number of reasons including landscape, environment, loss of agricultural land, impact on services and roads, lack of flexibility, potential delays in delivery with only limited support shown for a “sensitive” approach, indicates that the Council is not listening to the people they are supposed to represent.	<p>Para 5.5.61 cites consultation responses as part of an open approach. These matters were responded to as part of the Issues and Options consultation report. Subsequently, further technical work has addressed these matters in whole or part.</p> <p>No change to the IIA.</p>
<b>POIIA18</b>	Saxtons 4x4	Section 5	We would also note that the IIA does not seem to SA test alternative options to the employment allocations, or a “extend existing employment areas” options for assessment and we would seek confirmation that this has been undertaken. See attachment 1329238PO-A for full representation submission.	<p>The Preferred Options Consultation Document proposes a continuation of the existing approach to employment land provision, i.e. a flexible rolling employment land supply across the plan period to 2041 using a combination of existing and new sites to achieve this.</p> <p>Appendix G lists alternative sites which were rejected, whilst the Issues and Options Consultation identified alternative spatial approaches which included employment options.</p>

Reference	Consultee	Relevant paragraph/ table/figure/ appendix	Consultee Response Summary	Response/Action
				<p>Table 5.11 summarises the reasons for the rejection of alternative sites and site clusters.</p> <p>No change to the IIA.</p>
<b>POIIA13</b>	The Danbury Society	Section 5.5	In considering the objectives the IIA report found that the key likely significant sustainability effects associated with the spatial approaches includes Objective 9 Flood risk; To reduce the risk of flooding to people property taking into account the effects of Climate Change.	<p>Comment noted. The likely effects of climate change are incorporated into strategic and site policies, including suitable headroom and mitigation measures based on current best practice in site and building design, drawing on sources such as the Essex Design Guide.</p> <p>No change to the IIA.</p>
<b>POIIA17</b>	Hopkins Homes Ltd		The document does not consider the implications for development viability and deliverability of draft policies S2, DM25 and DM31	<p>Viability and deliverability are not direct IIA considerations, being covered by the Local Plan Review.</p> <p>No change to the IIA.</p>
<b>POIIA19</b>	Saxtons 4x4	Para. 1.4.9	Para 1.4.9 of the 2024 IIA confirms that “Development sites will be allocated to accommodate a minimum of 162,646 sqm of new employment business floorspace (Use Classes E(g)(i-iii), B2 and-B8) in addition to existing commitments over the Plan period”. It also confirms the spatial use of the area in a key diagram of its proposed spatial strategy (see attachment 1329238PO-A for diagram and full representation submission). The IIA also confirms that despite the settlement hierarchy of the plan of the 162,000 sqm needed for employment space only 9,000sqm of employment floorspace is to be provided in 2 locations at Maldon Way(4k) and 5k at previously developed sites in the urban Chelmsford urban area. We believe that additional suitable and available sites could increase this figure, better aligning with the spatial strategy. The IIA also cites various evidence base documents including councils own economic strategy, and Employment Land Review and Annual Monitoring Reports, that will need to ensure that future growth of Chelmsford's economy will be dependent upon “the provision of high quality development opportunities, including high	<p>Appendix G lists alternative sites which were rejected, whilst the Issues and Options Consultation identified alternative spatial approaches which included employment options.</p> <p>Table 5.11 summarises the reasons for the rejection of alternative sites and site clusters.</p> <p>No change to the IIA.</p>

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POIA23	Daniel James Developments	Section 5 and Appendix 6	<p>quality office space and industrial unit space, in order to attract new investors". Indeed 2 of the key sustainable objectives of the IIA are also cited as a) The need to deliver a range of employment sites to support economic growth. b) The need to ensure a flexible supply of land for employment development. In regard to traffic flows and in/out commuting the evidence base also states that there is "a significant outflow of commuters from the Chelmsford City Area alongside a significant inflow. In 2011, a total of 30,605 workers commuted into Chelmsford from other local authorities whilst 34,430 residents commuted out of Chelmsford. This represents a net outflow of 3,825 workers." With sustainable transport movements being a priority for the council we believe that all opportunities to retain and provide employment within the locale of the existing employment centres should be maximised. We would also note that the IIA does not seem to SA test alternative options to the employment allocations, or a "extend existing employment areas" options for assessment and we would seek confirmation that this has been undertaken. See attachment 1329238PO-A for full representation submission</p> <p>The Council has prepared a Sustainability Appraisal in accordance with Section 19(5) of the Planning and Compulsory Purchase Act 2024 and the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. This has been published in the form of an Integrated Impact Assessment (IIA) prepared by WSP. 3.2 Section 5 of the IIA addresses the reasons for the selection of the preferred spatial strategy and the rejection of alternatives, specifically Table 5.11 summarises the reasons for rejection of the clusters of alternatives sites. The IIA assesses an alternative spatial strategy, expanding the existing development allocations within the adopted spatial strategy with further expansion of Northeast Chelmsford (Chelmsford Garden Community). 3.3 This is however rejected owing to the assertion that the promoted development sites are not deliverable within the Plan period given permitted mineral extraction and land remediation works. Whilst it is not entirely clear what is being referred to by 'promoted sites', Land north and south of Peverels Farm due to its smaller scale than the wider CGC is more than likely to come forward within the Plan period, contributing positively to local housing supply trajectory as part of the CGC. 3.4 Appendix 6 of the IIA sets out the reasons for rejection of specific sites. However, it appears that Land north and south Peverels Farm has not been assessed as a reasonable alternative. DJD would strongly urge the Council to review the robustness of the IIA on the basis specific reasonable alternatives have not been assessed as part of the SA process, drawing into question the legal compliance of the draft Plan. 3.5 Were the Site to have been assessed as part of the IIA, it would represent a site that is deliverable within the Plan period and could contribute positively to the further expansion of the CGC.</p>	An assessment of the proposed site on land to the north and south of Peverels Farm (SHELAA Reference 21SHELAA60) will be presented in the IIA which accompanies the Pre-Submission Local Plan.

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
POIIA20	Welbeck Strategic Land V Limited	Appendix G	<p>These representations have been prepared by CODE Development Planners (hereafter referred to as 'CODE') on behalf of Welbeck Strategic Land V Limited (hereafter referred to as Welbeck Land', who are promoting land west of Barbrook Way for new residential development. The site is identified in the Chelmsford Strategic Housing and Employment Land Availability Assessment 2023-2024 as site CFS158. The site is bound to the east and north by existing residential development along Barbrook Way and Priory Road. Other boundaries include agricultural fields to the west and south related to Leighams Farm. The plan at appendix 1 shows the full extent of the landowners' ownership. These representations are made alongside three separate Vision Documents which outline different options for new residential development on land west of Barbrook Way. Whilst these representations are overarching, the Vision Documents should be considered individually. The site was previously in use as agricultural land and is currently used for the grazing of sheep and horses. The development of the site would support the provision of new homes to the benefit of the local community. The site has been assessed in the 2022-2023 and 2023-2024 SHELAA (site reference CFS158, 21SHELAA75, 21SHELAA93) as part of the call for sites exercise for the Chelmsford Local Plan Review. For the purposes of the 2023-2024 SHELAA, the three sites were combined and assessed under site reference CFS158. Part of the site (although boundaries have not been confirmed on the draft Policies Map) has been allocated for development of 20 dwellings on up to 1 hectare in the Regulation 18 Preferred Options Local Plan. This allocation is indicated as 'Policy 11c – Land west of Barbrook Way' in the Regulation 18 Preferred Options Local Plan. These representations are supported by and should be read in conjunction with the following submission documents: • Vision Document 1 of 3: Option 1, prepared by Edge, June 2024, which promotes up to 160 dwellings and an area of community park. • Vision Document 2 of 3: Option 2, prepared by Edge, June 2024, which promotes up to 190 dwellings, an area of community park and allotments. • Vision Document 3 of 3: Option 3, prepared by Edge June 2024, which promotes up to 250 dwellings, an extended area of community park, allotments, trim trails and edible routes. • Pell Frischmann: Initial Transport and Accessibility Appraisal, June 2024 • Pell Frischmann: Initial Flood Risk and Drainage appraisal, June 2024 • Tor&amp;Co: Landscape sensitivity assessment, June 2024 • Integrated Impact Assessment objective assessment table, prepared by CODE Development Planners, June 2024 (enclosed at appendix 2) Whilst Welbeck Land welcome the allocation of 20 dwellings on up to 1 hectare in 'Growth Site Policy 11c', further to CCC's assessment that the site is a suitable location for further growth, these representations consider that limiting the development to only 1 hectare limits the extensive benefits and infrastructure contributions that could be realised on this sustainable site in a Key Service Settlement, unconstrained by Green Belt designations. These representations consider three development options/phases more suited to the site; • Option 1: Residential development of part of the site up to 160 dwellings, with provision of a</p>	<p>All potential allocations have been assessed on an equal basis. Site options, including scales of development, were considered against SHELAA and IIA criteria. The preferred site allocation is part of the proposed strategy of the Local Plan which identifies Key Service Settlements such as Bicknacre for proportionate growth, meeting the requirement to identify land to accommodate 10% of the housing requirement on sites no larger than 1 hectare.</p> <p>Comments on alternative scoring are welcome and will be reviewed as part of the preparation of the Pre-Submission IIA.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			<p>community park. The community park will meet and over provide against requirements for Biodiversity Net Gain (BNG), will meet the policy requirement of DM17 planting three trees for every additional dwelling and policy requirements for publicly accessible open space. • Option 2: Comprises the above plus additional residential development for a total of up to 190 dwellings with provision of allotments, a multifunctional green infrastructure link along the southern boundary and creation of circular leisure routes. • Option 3: Comprises of all the above plus additional residential development on the south western parcel of the site to provide up to 250 dwellings with an additional extension to the community park, BNG in excess of the policy requirement and a community hub building located adjacent to the allotments. This community hub would include potential space for a café, communal office space with access to internet, printers, scanners, projector, soundproof booths and rented space for meetings. The corridors of multifunctional green space would be equipped with 'trim trails' and 'edible routes'. CODE (and Welbeck Land) consider all three development scenarios would accord with adopted and emerging policies set out within the Chelmsford Local Plan 2020 (adopted May 2020) and Chelmsford Local Plan Review, Preferred Options May 2024. These representations consider the approach of Chelmsford City Council (CCC) within the SHELAA 2023 and SHELAA 2024, the Integrated Impact Assessment and Spatial Strategy and draft policies included within the Regulation 18 Preferred Options Local Plan (May 2024). In summary, CODE is generally supportive of CCC's approach to the Preferred Options Local Plan, including the in principle support for allocation 11c. However, at the time of preparing these representations, whilst this progress is recognised, it is considered that the Regulation 18 Preferred Options Local Plan (May 2024) does not currently meet the tests of soundness, with further work required to ensure that it is positively prepared, justified, and effective (as required by paragraph 35 of the National Planning Policy Framework (NPPF). IIA comments (See attachment for full comments) Paragraph 35 of the NPPF states to be justified, a local plan must have; an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; The IIA prepared by WSP on behalf of CCC in May 2024, provides an appraisal of proposed site allocations and reasonable alternatives including the wider CFS158 site within appendix G of the IIA. The appraisal notes the following: "When compared to the preferred sites, the site complies less well with the Spatial Principles and Spatial Strategy in particular but not respecting the pattern of the existing settlement of Bicknacre. The site would result in more isolated development in the countryside. It would also have poorer access and connectivity to services and facilities available in Bicknacre village." There is no further assessment of the site and no evidence within the IIA to support these claims. CODE is unsure of the boundary used by CCC to reach the assessment for site CFS158, particularly in regard to the scheme 'not respecting the pattern of the existing settlement of Bicknacre' or that the proposal would 'result in more isolated development in the countryside.' The conclusions do not appear to reflect the Spatial</p>	

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			<p>Principles set out in Strategic Policy S1 nor within the Spatial Strategy set out in the Strategic Policy S7. Each of the vision documents submitted alongside these representations includes an illustrative masterplan which identifies the location of residential development on the site. The plans show residential development directly adjacent to existing residential development along Barbrook Way, whereas development in the western parcels of the site will be reserved for open space and therefore would not result in isolated development in the countryside. The landscape technical note prepared by Tor&amp;Co, notes the site is seen within the context of the urban edge of Bicknacre and therefore the site is not open countryside, but it is instead shares urban fringe characteristics. This contradicts the assessment within the IIA as development will respect the settlement pattern of Bicknacre by proposing development directly adjacent to the urban edge of Bicknacre within walking distance of all key services in Bicknacre and public transport. Within the reasoned justification for Growth Site Policy 11c in the Preferred Options Local Plan, paragraph 7.437 finds the site to be “adjacent to the defined settlement of Bicknacre” and is “within walking distance of the village shop, primary school, recreation ground, existing public transport connections, and other facilities in the village”. Therefore, it is unclear within the IIA as to why the wider site has been assessed to be isolated development with poor connectivity in spite of being located directly adjacent to the settlement edge of Bicknacre and still within walking distance to all key services whilst maintaining the settlement pattern of Bicknacre. Strategic Policy S1 in the Preferred Options Local Plan sets out the Spatial Principles that development should adhere to where relevant. Of most relevance to the site is principle (e) to “Focus development at the higher order settlements outside the Green Belt and respect the existing development pattern and hierarchy of other settlements”. All three developments propose development outside of the Green Belt, adjacent to the settlement boundary and within a Key Service Settlement where growth is supported. It is therefore considered the site complies well with the spatial strategy of the plan. In addition, whilst the assessment states the site complies ‘less well’ with the spatial strategy. Strategic Policy S7 (The Spatial Strategy) sets out the spatial strategy for the district and identifies Bicknacre as a Key Service Settlement only below Chelmsford City Centre and South Woodham Ferrers town centre in the settlement hierarchy. Within paragraph 6.27 of the Preferred Options Local Plan, Key Service Settlements are identified as the focus for housing provision with a higher level of growth. As such, the assessment within the IIA that development of this scale does not comply with the Spatial Strategy appears to conflict with the policies of the emerging local plan and is not justified by evidence within the IIA. Overall, CODE’s review of the IIA and the assessment of land west of Barbrook Way, Bicknacre has identified errors in the assessment of the site against key sustainability objectives which has directly impacted upon the overall scoring for the scheme. The consideration of potential reasonable alternatives on site has been undertaken without the benefit of clarification from Welbeck Land regarding the location of new residential</p>	

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			<p>development, or confirmation regarding the full extent of land to be promoted for consideration. The three Vision Documents accompanying this representation provide an overview of potential development options for land west of Barbrook Way. Whilst all three options are sustainable, and in accordance with the proposed spatial strategy for the Preferred Options Local Plan (and thereby reflecting the sustainability objectives within the IIA), CCC will note option 3 (for up to 250 dwellings) provides an opportunity for new community facilities, in addition to a development which respects and reflects the local character of this urban fringe location, and the existing settlement pattern. CODE considers the IIA should be revisited to assess the three options submitted for consideration with these representations. Without such an assessment, CODE considers the Local Plan as currently drafted is not justified by its evidence base and lacks a proper consideration of reasonable alternatives in accordance with the relevant SEA regulations.</p>	
<b>POIIA24</b>	Richard Speakman	Para 5.6.24, Table 5.11	<p>The IIA sets out the key sustainability issues, including population and housing. Namely, the need to create sustainable places where people want to live, work and relax, whilst managing and mitigating the climate emergency and impacts on biodiversity and ecology. In response to the key sustainability issues and problems, the IIA sets out the indicators which have been developed to enable the Council to consider the impacts and alternatives of plans, programmes and policies. Three of the IIA Objectives include to address population and community, health and wellbeing and transport and accessibility. It is our view that Policy S7: Spatial Strategy could better meet the IIA Objectives, through the inclusion of smaller allocations, adjacent to or outside defined settlement boundaries in sustainable locations where public transport is easily accessible. This in turn would assist in a range of positive effects across the IIA objectives namely minimising the effects on conservation areas, special landscapes. We consider draft Policy S7 has limited to no positive effect on transport and accessibility objective, and consider there to be an opportunity to create a policy that will contribute to and deliver smaller and more easily deliverable sites that have sustainable accessibility to local services, thus increasing support of existing community facilities and promoting the use of public transport and cycling. This would in turn have a positive effect on improving health in the locality, and potentially reduce negative effects on landscape and townscape objectives. Paragraph 5.6.24 of the IIA sets out the reasons for exclusion of alternative site allocations. Sandon has been disregarded due to the need to prevent coalescence with Sandon Village as identified in the adopted Sandon Neighbourhood Plan. This site would not cause coalescence as there is sufficient detachment from the surrounding developed areas and due to its location where the highway provides a natural boundary to the development. Please see the attached plan.</p>	<p>Comments on Policy S7 are noted.</p> <p>Potential allocations at Sandon were explored and discounted for the reasons set out in light of the consideration of technical evidence including the matter of the separation and retention of the physical identity of settlements.</p> <p>No change to the IIA.</p>



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POIIA22	Broomfield Parish Council	Para. 5.6.9	<p>The IIA seems to be unaware of the failure of the proposed access road into Broomfield Hospital as it states: '512 new homes on land in North Broomfield (allowing a new access into Broomfield Hospital and Fairleigh Hospice)' The Council would like to point this out, as this error may have lead to the site assessed too optimistically in terms of the impact on traffic. Also, the IIA does not seem to have taken account of recent landscape appraisals that form part of the Broomfield Neighbourhood Plan Evidence Base; and of limitation to pro The reasons for limiting development at 'north of Broomfield' to around 450 dwellings included landscape capacity and implications for primary school provision. Since the LP was drafted, there has been further professional landscape appraisal by Alison Farmer Associates in connection with the Broomfield Neighbourhood Plan (see: <a href="https://www.chelmsford.gov.uk/media/1m3mbwf3/9-landscape-appraisal-february-2019.pdf">https://www.chelmsford.gov.uk/media/1m3mbwf3/9-landscape-appraisal-february-2019.pdf</a> page 38). Any westerly expansion of the allocation would spread development onto the West Broomfield Farmland Plateau, which was judged in this Landscape Appraisal to be unsuitable for development. Any expansion northwards would lead to coalescence between the Broomfield and Little Waltham settlements. The Council would like these aspects to be noted briefly in the text. We request the addition of the following sentence to the section entitled 'Alternative Spatial Strategy – Expand the existing development allocations .....', 2nd para, after the 1st sentence (i.e after '.... strategic road network): 'In addition, further expansion at Broomfield would raise significant concerns due to landscape capacity and sensitivity; the danger of coalescence between settlements; and concerns about primary school capacity.</p>	The evidence cited will be taken into account in the next iteration of the IIA and the suggested text considered for inclusion in light of confirmation of the status of infrastructure enhancements.
POIIA26	Dandara	Appendix G	<p>3.1 The Integrated Impact Assessment (IIA) prepared by WSP on behalf of Chelmsford City Council comprises Sustainability Appraisal incorporating Strategic Environmental Assessment, a Health Impact Assessment, an Equalities Impact Assessment and Habitats Regulations Assessment and appraises the six broad strategic spatial options for where new development may take place in the Borough. 3.2 The IIA has been prepared to meet the requirements of the Strategic Environmental Assessment (SEA) Regulations and ensures that the legal requirements the Chelmsford Local Plan need to be subject to during preparation are adhered to. However, these will only be fully tested once the Plan reaches Submission and Examination stages in the future following further rounds of consultation and engagement. 3.3 Chapter 5 of the IIA sets out the assessment of the proposed growth areas and associated proposed site allocations. As mentioned in earlier parts of these representations, part of land east of Pleshey Road, Ford End has been allocated. 3.4 Table 5.9 provides a summary of the appraisal of proposed allocations in Growth Area 2 – North Chelmsford. The table has identified that the site allocation would have a very positive contribution to the IIA priority of providing more homes in Chelmsford. The site allocation also provides a positive contribution toward sustainable living and revitalisation, as well as mixed, minor or uncertain impacts on biodiversity, health and wellbeing and transport. The site</p>	<p>All potential allocations have been assessed on an equal basis. Site options, including scales of development, were considered against SHELAA and IIA criteria. The preferred site allocation is part of the proposed strategy of the Local Plan which identifies service settlements such as Ford End for proportionate growth, meeting the requirement to identify land to accommodate 10% of the housing requirement on sites no larger than 1 hectare.</p> <p>No change to the IIA.</p>

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			<p>allocation would have a small negative impact on cultural heritage and landscape and townscape. The only major negative impact relates to land use. Further commentary and explanation of this appraisal is provided at various points in the IIA. 3.5 We agree that the allocation of the site will have benefits towards the housing supply and the sustainability and revitalisation of the village of Ford End. We do, however, consider that the IIA should also recognise the benefits to biodiversity which will be provided through 10% BNG as well as benefits to highways which will be delivered through planning obligations such as a speed camera or a zebra crossing. Equally, the impacts to cultural heritage should be considered neutral as the site allocation already requires a scheme which is sensitive to the non-designated heritage asset which is the Ford End Primary School. 3.6 The IIA concludes that the site complies well with the Strategic Priorities, Vision, Spatial Principles and Spatial Strategy, in particular with regard to the Settlement Hierarchy. The site is also supported by the evidence base for the Plan, such as the Heritage Assessment and Landscape Capacity and Sensitivity Assessment. Overall, the IIA has not found any constraints which would hinder the deliverability, viability or availability of the site. Dandara completely support and agree with these conclusions. 3.7 However, the site which was submitted to the Call for Sites, as well as promoted through the Issues and Options consultation, covered 5.37 hectares and had the capacity to provide up to 50 homes. We do not agree with the IIA's reasoning for discounting the whole site and only allocating 1 hectare. On page 522 (Appendix G) the IIA gives the following reason for why the south part of the site has been discounted: The remaining non-allocated part and the southern parcel extend to the south. They are further away from the DSB and would not respect the existing settlement pattern of Ford End. The full site is greater than 1 hectare in size. 3.8 The Vision Document at Appendix 1 of this report demonstrates that the site would be able to come forward with a layout which is sensitive to the existing settlement pattern of Ford End. The masterplan focuses development to the north of the site, with large areas of open space and biodiversity corridors to the south. The larger allocation would allow for best practice place-making strategies, allowing the proposals to adapt to local circumstances and the opportunities on the site, and would require the creation of artificial boundaries rather than using the existing hedgerows. We therefore do not consider this a valid argument for discounting the site. 3.9 Furthermore, we recognise that the NPPF at paragraph 70 a) requires Local Planning Authorities to accommodate 10% of their housing requirements on sites no larger than 1 hectare. We also support that the Council is identifying sites which are 1 hectare, however, we query the type of sites which have been selected for this. We specifically query land east of Pleshey Road which would have been able to provide many benefits as a larger site such as land for the primary school, extensive open space, and more affordable and market homes. We believe that this requirement in the NPPF is primarily concerning sites which would form infill development, or smaller brownfield sites within urban areas. The reasoning behind the</p>	

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			<p>paragraph is to ensure that sites can be delivered quickly, not to limit the number of homes which are delivered overall. 3.10 Land east of Pleshey Road, Ford End is under option by Dandara, a national housebuilder who intends to progress with the site swiftly once the Plan has been adopted. The site is predicted to be delivered within 5 years from the adoption of the Plan, and we consider that a larger allocation of the site is necessary to combat the risk identified in the current Plan which has planned for the majority of growth in North Chelmsford to be delivered through the Garden Community, which is at high risk of being delayed, especially when considering how delayed the strategic sites allocated in the 2020 adopted Local Plan have been. We therefore again conclude that this is not a valid argument for discounting the southern part of the site. 3.11 The IIA has demonstrated that land east of Pleshey Road, Ford End is in line with the draft Local Plan, has beneficial impacts on housing supply and the sustainability of Ford End, whilst also not having any constraints associated with its deliverability (although this appraisal is only considering 1 hectare of the site, we argue that this is applicable to the site as a whole). The IIA has not provided robust arguments for not allocating the whole site, and we therefore urge the Council to reconsider a larger allocation at land east of Pleshey Road, Ford End.</p>	
<b>POIIA21</b>	Taylor Wimpey	Section 5 West Chelmsford 21SHELAA41	<p>4.21. Paras. 5.6.24 and Table 5.11 drawing on Appendix G ‘Appraisal of Proposed Site Allocations (including Reasons for the Rejection of Alternatives)’ of the Preferred Options IIA summarises the reasons for the rejection of alternative allocations. In rejecting greater growth at West Chelmsford Table 5.11 states that this is due to the impact on and the capacity of the local road network and relative remoteness from the strategic road network.</p> <p>4.22. Turning to Appendix G of the IIA (pp. 519), the site (21SHELAA41) has been rejected because it: “... is adjacent to the allocated site (Location 2) and Area for Future Recreational Use and/or SuDS. When compared to the preferred site, this would result in more isolated development in the Rural Area and have the potential to have greater landscape impacts. Overall, this site is considered to perform less well than the allocated site against the Spatial Strategy and Spatial Principles.</p> <p>4.23. The Crest site (CFS165) (pp. 519) has been rejected for the same reason.</p> <p>4.24. Finally, the Dandara site (CFS182) (pp. 519) was rejected on the basis that it performed less well in sustainability terms than the Warrens Farm allocation due to poorer access and connectivity into Chelmsford’s Urban Area.</p> <p>4.25. Taylor Wimpey submits that the basis for rejecting either of these sites on this basis is fundamentally flawed because the proposals are additional, and not as an alternative, to the</p>	<p>Appendix G states that:          “This is adjacent to the allocated site (Location 2) and Area for Future Recreational Use and/or SuDS. When compared to the preferred site, this would result in more isolated development in the Rural Area and have the potential to have greater landscape impacts. Overall, this site is considered to perform less well than the allocated site against the Spatial Strategy and Spatial Principles.”</p>

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			existing allocation – to be delivered within the timeframe of the currently adopted Local Plan i.e. by 2036 - to support Chelmsford's development needs between 2036 to 2041 and beyond.	
POIIA27	David Simmonds	Objectives 13 and 14	The IIA identifies the key sustainability issues for the Review of the Local Plan. It does this by identifying 14 Assessment Objectives. Numbers 13 and 14 are relevant: 13. Cultural Heritage: To conserve and enhance the historic environment, cultural heritage, character and setting. 14. Landscape and Townscape: To conserve and enhance landscape character and townscapes. There is no reference to J A Baker in this document. The failure to consider Baker and the landscape that he wrote about should be rectified with the IIA being amended to take account of his international cultural importance as discussed in the comments above relating to the Local Plan Review. (attached at 1360668PO-A and B)	Request for reference to JA Baker and his association with the Chelmer Valley is noted. Comments to this effect have not been received from Historic England or Natural England.  No change to the IIA.
POIIA64	Chignal Parish Council	Appendix F	In the Integrated Impact Assessment, APPENDIX F, Little Boyton Hall Farm has negative effects on all of the guide questions and it scored the lowest in average sustainable accessibility. This site will contribute to the City's employment capacity, extending an existing employment area into adjacent greenfield land, resulting in significant positive effects on Objective 3 but it will have significant negative effects on Objective 7 (Land use, Grade 2 agricultural land) and on 13 and 14 (Cultural heritage and landscape). Although Little Boyton Hall Farm is in Roxwell parish, it more visible across the Can valley from Chignal St James, especially from the Chignals and Mashbury Village Hall, adjacent playing field and from homes on Chignal Hall Lane and from Howletts Hall. The proposed northward extension of this employment area, making it 3 times larger, would make it clearly visible on the skyline, even with extensive new tree belts to screen it. Chignal parish sits within the Pleshey Farmland Plateau Chelmsford Character Landscape which has a 'strong sense of tranquillity' as a key characteristic. 'The views within the area vary from open views over the arable farmland on the highest land to the enclosed views in the valleys in the south of the area'. It is noted that 'the erection of new farm buildings on the higher areas, could be conspicuous on the skyline.' Any new development in this character landscape area should be small-scale, responding to the historic settlement pattern, landscape setting and locally distinctive building styles. We do not agree with the assessment of this employment site extension in the LANDSCAPE SENSITIVITY AND CAPACITY STUDY, FEBRUARY 2024 as it focuses on views from the south and east and largely ignores the impact on views from Chignal parish of such a large extension of the site to the north. We disagree with the statement in 10.15 that the development could effectively be mitigated without altering the intrinsic character of the landscape in this location and in that there is little interaction with external visual receptors. The extensive construction of agricultural buildings on the skyline of the Can Valley which	The Landscape and Sensitivity Study 2024 notes that: <i>"The overall visual sensitivity is judged to be moderate, reflecting the location, high quality screening, remoteness of BCLP1, and the small presence recreational visual receptors on its periphery. Development could effectively be mitigated without altering the intrinsic character of the landscape in this location."</i>  The IIA scoring for this site (Appendix G p.496) acknowledges negative effects including loss of greenfield land (significant negative) and landscape (minor negative), noting that Policy 15 contains mitigation measures to be applied which include building design and landscaping.  A degree of visual sensitivity is clearly present, which will potentially include

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			have been subsequently converted to industrial uses at Boyton Hall, Chignal Hall Farm and Little Boyton Hall Farm are already clearly visible from the Village Hall. (See attachment for full representation, 308535PO-A)	views from residential properties and communal areas.  No change to the IIA.
POIIA28	Vishal Sharma	Appendix G	The IIA set out early on in the document the key sustainability issues, including population and housing. Namely, the need to create sustainable places where people want to live, work and relax, whilst managing and mitigating the climate emergency and impacts on biodiversity and ecology. In response to the key sustainability issues and problems, the IIA sets out the indicators which have been developed to enable the Council to consider the impacts and alternatives of plans, programmes and policies. Three of the IIA Objectives include to address population and community, health and wellbeing and transport and accessibility. It is our view that Policy S7: Spatial Strategy could better meet the IIA Objectives, through the inclusion of smaller allocations, adjacent to or outside defined settlement boundaries in sustainable locations. This would ensure the needs of the population of Chelmsford are met across the City area. This in turn would assist in a range of positive effects across the IIA objectives namely minimising the effects on conservation areas, special landscapes, reliance on private car. We consider the Policy (draft Policy S7) has limited to no positive effect on transport and accessibility objective, and consider there to be an opportunity to create a policy that will contribute to and deliver smaller and more easily deliverable sites across the City area. This will in turn promote sites that are already in close proximity to local services, thus supporting existing community facilities and promoting a shift from private cars to more walking and cycling. This would in turn have a positive effect on improving health in the locality, and potentially reduce negative effects on landscape and townscape objectives. For more info see Attachment 1339358PO-A.	Comments on Policy S7 are noted.  Potential allocations at Sandon were explored and discounted for the reasons set out in light of the consideration of technical evidence including the matter of the separation and retention of the physical identity of settlements.  No change to the IIA.
POIIA56	Van Diemans Property Company	Land at Silver Ash, Cranham Road, Little Waltham	Appendix 6 of the IIA sets out the reasons for rejection of specific sites. However, it appears that Land at Silver Ash has not been assessed as a reasonable alternative. Van Dieman would strongly urge the Council to review the robustness of the IIA on the basis specific reasonable alternatives have not been assessed as part of the SA process, drawing into question the legal compliance of the draft Plan.	An assessment of the proposed site on land at Silver Ash, Little Waltham (SHELAA Reference: 21SHELAA83) will be presented in the IIA which accompanies the Pre-Submission Local Plan.
POIIA57	Miscoe Enterprises Ltd	Section 5 and Appendix 6	The focus of this representation relates to Miscoe's interests in Land rear of Broomfield Library (hereafter referred to as the "Site"). The Council has prepared a Sustainability Appraisal in accordance with Section 19(5) of the Planning and Compulsory Purchase Act 2024 and the requirements of the Environmental Assessment of Plans and Programmes	Changes to the Green Wedge boundaries have been discounted as sufficient and suitable land is available outside the Green Wedge to meet the

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			Regulations 2004. This has been published in the form of an Integrated Impact Assessment (IIA) prepared by WSP. 3.2 Section 5 of the IIA addresses the reasons for the selection of the preferred spatial strategy and the rejection of alternatives, specifically Table 5.11 summarises the reasons for rejection of the clusters of alternatives sites. 3.3 Appendix 6 of the IIA sets out the reasons for rejection of specific sites. However, it appears that Land rear of Broomfield Library has not been assessed as a reasonable alternative. Miscoe would strongly urge the Council to review the robustness of the IIA on the basis specific reasonable alternatives have not been assessed as part of the SA process, drawing into question the legal compliance of the draft Plan. 3.4 Were the Site to have been assessed as part of the IIA, it would represent a site that is deliverable within the Plan period and could contribute positively to housing delivery in Broomfield. (See attachment 312377PO-A and 312377PO-B for full representation)	<p>area's development needs in a sustainable way. This approach has therefore been discounted.</p> <p>No change to the IIA.</p>
<b>POIIA28</b>	Whirledge & Nott	Approach C – Exploring a wider strategy	Strategic Policy S7 – The Spatial Strategy We support the identification of Galleywood as a Key Service Settlement (Tier 2 in the hierarchy of Policy S7). However, for the reasons already given, it is essential that a Green Belt Review be undertaken urgently and land at Rignal's Lane, Galleywood identified as a suitable housing site. To support this, Growth Area 3 should be expanded to reference the site and other allocations to the north of the district (Growth Area 2) deleted. This will ensure a more balanced, equitable distribution of new housing throughout the District, an alleviation of the pressures on existing schools and health facilities and the ability to better meet the needs of the population as a whole. To this end, the accompanying Visioning Document explains how the site can contribute in a sustainable way to delivering new homes, infrastructure and growth at Galleywood. This is considered in more detail in our representations to Growth Area 3.	<p>Advocacy for a Green Belt Review is noted.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. It would also undermine the protection of the Green Belt by national planning policy. This approach has therefore been rejected by the Council.</p> <p>No change to the IIA.</p>
<b>POIIA30</b>	Whirledge & Nott	Approach C - Exploring a wider strategy	Criterion e) of Policy S1 seeks to focus development at the higher order settlements outside the Green Belt and respect the development pattern and hierarchy of other settlements. This criterion is not consistent with our previous strategic comments which seek a Green Belt Review and the identification of suitable sites for development within the Green Belt. The Council has not undertaken a thorough and conclusive review of alternatives. Without this, and a full reconsideration of housing and other sites in the south of the district, the issues raised in our comments on Strategic Priority 4 and 8 would result in an unbalanced growth strategy that is not sustainable. It is essential that all options and alternative growth strategies are reviewed, and conclusions drawn on a full and comprehensive evidence base. It is not considered sufficient to exclude all development from the Green Belt based simply upon its	<p>Advocacy for a Green Belt Review is noted.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. It would also undermine the protection of the Green Belt by national</p>

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			<p>historic designation. The NPPF explains that altering Green Belt boundaries can occur where exceptional circumstances warrant it. The strategic policies are expected to outline the circumstances of Green Belt release (paragraph 140 of NPPF refers). The NPPF states at paragraph 142 that “when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.” The guidance goes on to explain the situations where Green Belt release should be considered. Scope is provided for authorities to release Green Belt land where it is necessary and exceptional reasons exist. We argue that the impacts upon resources, infrastructure and the polarising of the district warrant careful consideration of introducing growth/development to the south of the district. In this context these submissions promote additional growth at Galleywood an inherently sustainable settlement and particularly land at Rignal’s Lane Galleywood for 250 new dwellings. Consequently, we recommend that criterion e) be amended to say: “Focus the majority of development at the higher order settlements outside the Green Belt but identify growth opportunities within the Green Belt where these are exceptionally sustainable and respect the development pattern and hierarchy of other settlements.”</p>	<p>planning policy. This approach has therefore been rejected by the Council.</p> <p>No change to the IIA.</p>
<b>POIIA63</b>	Chignal Parish Council	Table 5.11, and Appendix G	<p>We welcome the decision not to extend existing Local Plan growth allocations, such as Strategic Growth Site 2 - West Chelmsford, (Warren Farm). It is noted that the reasons for excluding Alternative sites in the Integrated Impact Assessment report, Table 5.11 in relation to West Chelmsford, included the impact on and the capacity of the local road network and relative remoteness from the strategic road network. The diversity of Chelmsford’s landscapes and wildlife habitats is one of its strengths. We support the need to “Respect the character and appearance of landscapes and the built environment, and preserve or enhance the historic and natural environment and biodiversity”. The Integrated Impact Assessment: Appendix G, (Appraisal of proposed site allocations and reasonable alternatives) for Strategic Growth site 2 – West Chelmsford states that “Whilst the policy requires an appropriate landscaped edge to mitigate the visual impact of the development, in view of the scale of development and loss of greenfield land, effects on landscape and townscape (IIA Objective 14) are still considered to be significant”. We welcome the recognition that the existing housing allocation area needs extensive landscaping, especially on the northern and western edges and that it should not be extended because of the landscape impact and further loss of Grade 2 agricultural land. (See attachment for full representation 308535PO-A)</p>	<p>Support noted for West Chelmsford not to be extended as part of the Local Plan Review.</p> <p>No change to the IIA.</p>
<b>POIIA48</b>	Cliffords Group Ltd	Appendix F	<p>The Council has prepared a Sustainability Appraisal in accordance with Section 19(5) of the Planning and Compulsory Purchase Act 2024 and the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. This has been published in the form of an Integrated Impact Assessment (IIA) prepared by WSP. Section 5 of the IIA addresses the reasons for the selection of the preferred spatial strategy and the rejection of</p>	<p>Changes to the Green Wedge boundaries have been discounted as sufficient and suitable land is available outside the Green Wedge to meet the area’s development needs in a</p>

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			<p>alternatives, specifically Table 5.11 summarises the reasons for rejection of the clusters of alternatives sites. Appendix 6 of the IIA sets out the reasons for rejection of specific sites. However, it appears that Land south of Wheelers Hill has not been assessed as a reasonable alternative. The Applicant would strongly urge the Council to review the robustness of the IIA on the basis specific reasonable alternatives have not been assessed as part of the SA process, drawing into question the legal compliance of the draft Plan. Were the Site to have been assessed as part of the IIA, it would represent a site that is deliverable within the Plan period and could contribute positively to housing delivery in Little Waltham. See attachment 873301PO-A for full representation submission.</p>	<p>sustainable way. This approach has therefore been discounted.</p> <p>No change to the IIA.</p>
<b>POIIA52</b>	Cliffords Group Ltd	Appendix F	<p>The Council has prepared a Sustainability Appraisal in accordance with Section 19(5) of the Planning and Compulsory Purchase Act 2024 and the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. This has been published in the form of an Integrated Impact Assessment (IIA) prepared by WSP. Section 5 of the IIA addresses the reasons for the selection of the preferred spatial strategy and the rejection of alternatives, specifically Table 5.11 summarises the reasons for rejection of the clusters of alternatives sites. Appendix 6 of the IIA sets out the reasons for rejection of specific sites. However, it appears that Campion Farm has not been assessed as a reasonable alternative. The Landowners would strongly urge the Council to review the robustness of the IIA on the basis specific reasonable alternatives have not been assessed as part of the SA process, drawing into question the legal compliance of the draft Plan. Were the Site to have been assessed as part of the IIA, it would represent a site that is deliverable within the Plan period and could contribute positively to housing delivery in Broomfield. See attachments 873301PO-C and 873301PO-D for full representation submission.</p>	<p>Changes to the Green Wedge boundaries have been discounted as sufficient and suitable land is available outside the Green Wedge to meet the area's development needs in a sustainable way. This approach has therefore been discounted.</p> <p>No change to the IIA.</p>
<b>POIIA49</b>	Cliffords Group Ltd	Appendix F	<p>Land East of Back Lane - The Council has prepared a Sustainability Appraisal in accordance with Section 19(5) of the Planning and Compulsory Purchase Act 2024 and the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. This has been published in the form of an Integrated Impact Assessment (IIA) prepared by WSP. Section 5 of the IIA addresses the reasons for the selection of the preferred spatial strategy and the rejection of alternatives, specifically Table 5.11 summarises the reasons for rejection of the clusters of alternatives sites. Appendix 6 of the IIA sets out the reasons for rejection of specific sites. However, it appears that Land east of Back Lane has not been assessed as a reasonable alternative. The Applicant would strongly urge the Council to review the robustness of the IIA on the basis specific reasonable alternatives have not been assessed as part of the SA process, drawing into question the legal compliance of the draft Local Plan. Were the Site to have been assessed as part of the IIA, it would represent a site that is</p>	<p>Changes to the Green Wedge boundaries have been discounted as sufficient and suitable land is available outside the Green Wedge to meet the area's development needs in a sustainable way. This approach has therefore been discounted.</p> <p>No change to the IIA.</p>



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			deliverable within the Plan period and could contribute positively to housing delivery in Chelmsford.	
<b>POIIA61</b>	Environment Agency	Appendix B; Section 3	Recommendations for policy changes in respect of: Flood Risk, Ecology, Water Resources and Quality, Sustainable Drainage Systems, Land Contamination and Waste Management	The text relates to the Local Plan Review main document and does not reference the IIA.  No change to the IIA.
<b>POIIA47</b>	Hill Residential Ltd	para 5.5.19, table 5.7, para 5.5.82-5.5.85, Appendix D, Page 405, Appendix K	The Preferred Options Consultation document has been published alongside an Integrated Impact Assessment which has been prepared by WSP on behalf of Chelmsford City Council. The Integrated Impact Assessment is a technical part of the evidence base supporting the preparation of the Local Plan, strategy and policies emerging as the Council undertake a comprehensive review of their existing Local Plan. We note that the Integrated Impact Assessment aligns with the Council priorities and objectives and has considered the Preferred Options along with a variety of alternative options. Within the Preferred Options consultation document, the Council has outlined a decision not to re-visit the boundaries of the Green Belt across Chelmsford. The Integrated Impact Assessment has followed this decision and therefore not considered the opportunities to deliver Council Priorities and Objectives by using locations within the Green Belt. The Council have relied on the 2021 SHELAA Report which shows “that more than sufficient land is being promoted for development outside of the Green Belt and Green Wedge through the SHELAA call for site process to meet the identified development needs for the new Local Plan period including the housing requirement set out within the Preferred Options Consultation Document” (para 5.5.19, page 143 of the Integrated Impact Assessment). The approach is flawed because the Integrated Impact Assessment should take an objective view and not be guided by “policy on” and this is further reinforced incorrectly through the alternative spatial options identified and considered in Table 5.7 of the Integrated Impact Assessment. In the context of a housing crisis being declared by the Council, we agree that settlements with a range of services and facilities are capable of delivering the housing numbers required to meet needs. However, the alternatives all fail to consider the opportunities that are presented by sustainable settlements which are in the Green Belt. The Integrated Impact Assessment should have been prepared with considerations as to how Green Belt release and amendments to boundaries would help to deliver the Council priorities and achieve sustainable development over the plan period. Existing locations within the Green Belt such as Writtle offer a wide range of services and facilities, yet are unnecessarily constrained by the long standing designation and policy of restraint which relates to Green Belt. The Council appear to have	The IIA will appraise the Local Plan Review from Issues & Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.  Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council’s administrative area in a sustainable way. It would also undermine the protection of the Green Belt by national planning policy. This approach has therefore been rejected by the Council.  No change to the IIA.

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			<p>not taken this option into consideration as part of the Preferred Options and therefore the approach is flawed. Paragraphs 5.5.82-5.5.85 of the Integrated Impact Assessment provide detail as to why the Council have not considered Green Belt release and we disagree with this approach. We acknowledge that the Green Belt is a national designation and the NPPF provides the most up to date position from the Government. The detailed boundaries in Chelmsford were confirmed by the Site Allocations Document in 2012 and remain as part of the adopted Local Plan. As these boundaries have been established for over 10 years, the Local Plan Review provides the perfect opportunity to reconsider the boundaries and ensure they still meet the necessary purpose. The Council have also declared a housing crisis and this in our view provides the exceptional circumstance under which a review is to be undertaken to provide an up to date position and the Integrated Impact Assessment should be used to help guide and inform future policy decisions. Appendix D of the Integrated Impact Assessment looks at the key settlements across the plan area. It is noted that Chelmsford has two major centres alongside other key service settlements which provide strong character to the area. One of these key settlements is Writtle. Page 405 of the Integrated Impact Assessment provide detail on the settlement of Writtle and clearly shows the proximity to Chelmsford as the main urban area. The Council also outline that the settlement has a wide variety of services including “surgery, two schools, pharmacy, dentist, five public houses, library, five sports facilities, a post office, ARU Writtle and a BT depot”. The table on page 405 also indicates that to the north, south and west of Writtle, land is designated as Metropolitan Green Belt but it fails to highlight the special characteristics of this designation, nor why the boundaries should be retained without revision at Writtle. We agree with the Council summary on Writtle as this clearly confirms that the area is sustainable and can promote sustainable development. Appendix K provides further detail on the approach of the Council to the appraisal of alternative spatial approaches and how these “perform” against the assessment objectives. The release of land from the Green Belt should have been considered as part of the alternative approaches yet this has not been done in a clear and comprehensive manner so there is no way of knowing what the overall impact on the objectives would be. Without this process being undertaken in a justified and objective manner the Council can not be confident that all reasonable alternatives have been considered and therefore assessed correctly as part of the Local Plan preparation in accordance with the tests of soundness as outlined in the National Planning Policy Framework.</p>	
<b>POIIA38</b>	Essex County Council	Para. 6.1.9	<p>Consequently, ECC supports the conclusion in the Integrated Impact Assessment (IIA) paragraph 6.1.9, which states: 'Five alternative Spatial Approaches to the preferred Spatial Strategy were assessed in the Issues and Options IIA Report. Overall, these alternative approaches are considered to perform less well than the preferred Spatial Strategy when</p>	Support noted.  No change to the IIA.

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			considered against national planning policy, an analysis of the Issues and Options consultation responses, the Issues and Options IIA Report, the Local Plan Vision and Spatial Principles, Settlement Hierarchy, environmental constraints, the availability and viability of land for development and discussions with key stakeholders.' See attachment 311148PO-A for full representation submission.	
<b>POIIA56</b>	Van Diemans Property Company	Appendix G	The focus of this representation relates to Van Dieman's interests in Land at Silver Ash, Little Waltham (hereafter referred to as the "Site"). The Council has prepared a Sustainability Appraisal in accordance with Section 19(5) of the Planning and Compulsory Purchase Act 2024 and the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. This has been published in the form of an Integrated Impact Assessment (IIA) prepared by WSP. 3.2 Appendix 6 of the IIA sets out the reasons for rejection of specific sites. However, it appears that Land at Silver Ash has not been assessed as a reasonable alternative. Van Dieman would strongly urge the Council to review the robustness of the IIA on the basis specific reasonable alternatives have not been assessed as part of the SA process, drawing into question the legal compliance of the draft Plan. 3.3 Were the Site to have been assessed as part of the IIA, it would represent a site that is deliverable within the Plan period and could contribute positively to the employment needs of Chelmsford as regional hub for employment. (See attachment 873317PO-A for full representation)	The IIA has assessed those sites which are considered to be reasonable options, including the identification of reasonable alternatives. Sites which are not considered as part of this process have failed to meet the selection criteria applied.  No change to the IIA.
<b>POIIA60</b>	Basildon Council	Whole document	Basildon Borough Council has reviewed the contents of the Integrated Impact Assessment, which reviews the key sustainability issues for the review of the Local Plan. While the assessment suggests that no significant negative cumulative effect arise from the interaction between the Preferred Options Document and surrounding local authorities policies, the emerging Basildon Local Plan is acknowledged. The Assessment concludes that the spatial priorities are broadly compatible with the assessment objectives and provides suggested measures that should be considered by the Council as part of the further refinement of the Local Plan Review. Reference to the effects and monitoring of policies should be taken into consideration.	Accordance of the analysis of the IIA with the emerging Basildon Plan is acknowledged.  No change to the IIA.
<b>POIIA53</b>	Gladman Developments Ltd	Reasonable Alternatives	The Chelmsford Local Plan Review Preferred Options consultation is supported by an Integrated Impact Appraisal (IIA) which wraps up the legal requirements of the Local Plan Review. Gladman consider that further work needs to be undertaken through the Sustainability Appraisal (SA) element of the IIA so that the Local Plan Review is capable of fulfilling its legal obligations. In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, local planning authorities must subject proposals in development plan documents to SA and prepare a report on the findings of the appraisal. The SA must	The IIA appraises the Local Plan Review from Issues & Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.

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<b>POIIA45</b>	Tritton Farming Partnerships LLP	Appendix G	<p>incorporate the legal requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 and associated directive. The Directive sets out the relevant requirements and considers that the preparation and adoption of a Local Plan should be subject to an environmental assessment as defined in Article 2b), this will include the preparation of an 'environmental report' as defined by Article 2c) and involves information required in Article 5 and Annex I. Crucially, the SA process should clearly justify its policy choices in meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Local Plan's decision-making and scoring should be robust, justified, and transparent. Gladman contend that the SA currently fails to meet the requirements of National Policy Guidance, the 2004 Regulations and the Directive and as a result the Chelmsford Local Plan Review cannot therefore be considered an appropriate strategy for the purposes of NPPF Paragraph 35. The reasons for this view will be discussed below. Assessment of Reasonable Alternatives Gladman do not consider that sufficient assessment of the reasonable alternatives to the Hammonds Farm site have been considered therefore, there is not sufficient evidence to suggest that this is the most sustainable option when compared with other large scale strategic sites available in the area. Had further work been undertaken, Gladman contend that it would be likely evident that the Hammonds Farm allocation would not represent the most reasonable approach. The five spatial strategies that were considered were narrowed down to three hybrid spatial strategy options. Recognising that there would be a large number of potentially hybrid strategies an element of planning judgement therefore needs to be applied, Gladman contend that the hybrid strategies should be revisited and the exercise undertaken again. We would suggest an alternative strategy to Hammonds Farm as strategic growth at Boreham, Howe Green, East Hanningfield, Rettendon, Bicknacre and Danbury. Assessment of such a hybrid strategy should be afforded the same flexibility in terms as mitigation as that of the Hammonds Farm option. As for example, the current hybrid strategy discounts sites for highways capacity or relative isolation yet these are the exact issues that Hammonds Farm will have to address. Development of sites in these locations would provide the infrastructure required, flexibility afforded to the assessment of Hammonds Farm but in a more dispersed way so that there is less reliance on any one location to deliver the future housing growth of the Local Plan Review.</p>	<p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. It would also undermine the protection of the Green Belt by national planning policy. This approach has therefore been rejected by the Council.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Preferred Options Local Plan presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements.</p> <p>No change to the IIA.</p>
			<p>Preparation of the new Chelmsford Local Plan is required to comply with Directive 2001/42/EC ('the SEA Directive'), the plan-making aspects of which are transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) ('the SEA Regulations'). Regulations 12 and 16 of the SEA Regulations are considered of particular relevance to our comments on the dLP and its</p>	<p>The IIA appraises the Local Plan Review from Issues &amp; Options Stage through to Submission. This includes reasonable alternatives in the form of spatial, site and policy options.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			<p>approach to meeting the requirements of the SEA Regulations. Regulation 12(1) of the SEA Regulations states that where environmental assessment is required by any provision of Part 2 of the SEA Regulations, an Environmental Report must be prepared which accords with Regulation 12(2) and 12(3). It is understood that in this instance the Environmental Report takes the form of the draft Local Plan Integrated Impact Assessment. Regulation 12(2) requires the Environmental Report to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives. Regulation 12(3) sets out the information required to be included within the Environmental Report, referencing Schedule 2 of the SEA Regulations. Schedule 2 states that Strategic Environmental Assessment should consider short, medium and long term effects; permanent and temporary effects; positive and negative effects; and secondary, cumulative and synergistic effects. Regulation 16 requires that the reason for the selection of options, and the reasons for the rejection of reasonable alternatives, be made clear within the Environmental Report. Separate to the issue vis-à-vis the IIA and the new Local Plan's compliance with the SEA Regulations, the IIA's sustainability appraisal of options is performs an important role in demonstrating its soundness. As the IIA recognises itself at paragraph 1.2.4 and 1.2.5, national policy and guidance makes clear that sustainability appraisal has an important role in demonstrating local plans reflect sustainability objectives and have considered reasonable alternatives; which contributes to ensuring they are justified and can be found sound. We have a number of comments to make on the IIA, its compliance with SEA Regulations and its ability to demonstrate a justified, sound Local Plan in its current form. In terms of how the IIA has considered the Site and its proposed development for a new community, in short it simply has not appraised it as an option. Whilst it could be argued that the appraisal of Chatham Green as an alternative location for growth as part of an alternative spatial strategy (as discussed within Table 5.11 of the IIA) constitutes appraisal of such an option, when one considers how this has been appraised, it evidently does not consider what is proposed for the Site. It is important to note that the proposed development entails provision of a new community. Whilst Chatham Green is the closest settlement, located on the opposite side of Braintree Road, it is functionally separate from this hamlet. The Proposed Development would incorporate new services, facilities and infrastructure. The reason for the rejection of Chatham Green, which includes the following, makes clear that what is being appraised is an extension to this existing community: "Its relative isolation from existing services and facilities which would lead to higher reliance on the use of the private car" The above does not account for the new services and facilities that are being proposed for the development of the Site. Neither does it account for existing and planned new services and facilities in North Chelmsford, in proximity to the Site and with the potential to be accessed by sustainable modes of transport. Other reasons for the rejection of Chatham Green, as per Table 5.11, include landscape sensitivity. However, the evidential basis for this</p>	<p>The Preferred Options presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements.</p> <p>Alternative spatial strategies were considered at the Issues and Options Stage of the Local Plan Review, including growth along transport corridors such as that at Chatham Green. The approach has not been taken forward as part of the spatial strategy. Specifically, land at Chatham Green was rejected due to its relative isolation from existing services and facilities which would lead to higher reliance on the use of the private car, landscape capacity and sensitivity concerns and capacity limits at the wastewater recycling facilities serving the area.</p> <p>An assessment of the proposed site on land at Chatham Green will be presented in the IIA which accompanies the Pre-Submission Local Plan.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			<p>conclusion is far from clear. Insofar as concerns the Site, at least, it is not subject to any designations that suggest it is of any particular landscape sensitivity. The Site and surrounds is not subject to any designations which suggest it is of particular landscape importance, or that its development would result in any landscape impacts above those one would expect from any greenfield site. Given that options that do entail loss of greenfield beyond existing settlement boundaries have been selected, the mere fact that an option would result in loss of such land cannot feasibly form part of its reason for rejection. The third and final reason for the rejection of the option for directing significant growth to Chatham Green pertains to capacity limits at the wastewater recycling facilities serving the area. It is understood that the basis for such concerns is the Chelmsford Council Water Cycle Study (February 2024), and the matter of the capacity of the Great Leighs WRC this raises. As noted in Section 3 of this representation, a Foul Drainage Technical Note has been prepared which confirms that issues with the capacity of Great Leighs WRC can be resolved. In short, none of the reasons for rejection of Chatham Green are applicable to the Site (i.e. they are not applicable to Land East of Chatham Green / South of Great Leighs). Case law confirms the need for reasonable alternatives to be appraised, and to the same level of detail as selected options (5 Heard v Broadland DC, South Norfolk DC &amp; Norwich City Council [2012] EWHC 344 (Admin) ); and the need to ensure that such an appraisal is on an evidential basis (Stonegate Homes Ltd v Horsham DC [2016] EWHC 2512) . In the case of the proposed provision of a new community on the Site, it has either not been appraised yet as an option; or, if alternatively, proposed growth at Land East of Chatham Green / South of Great Leighs were to be considered of sufficient equivalence, then the reasons for rejection include those that are not supported by evidence / new evidence has demonstrated the matters raised do not justify rejection of the option. As confirmed in Stonegate, it is important that decisions within Strategic Environmental Assessments are based on evidence and respond to new evidence as it arises. Failure to do so can result in a failure to meet the requirement of the SEA Regulations for alternatives to be assessed in a comparable manner, as Stonegate confirms. As an additional point, it is unclear why the IIA considers that growth at Chatham Green can only be seen as an alternative to a new East Chelmsford Garden Community at Hammonds Farm. The two are not mutually exclusive, and we consider that at the very least the option of both coming forward in conjunction with one another merits appraisal, particularly given the likely significant benefits of both, not least in terms of enhancing the prospects that the community's various accommodation needs will be met. As with the preparation of a Local Plan, its accompanying sustainability appraisal is an iterative process. Case law confirms that defects within reports intended to discharge the requirements under the SEA Regulations can be remedied, even at a very late stage in the process (see Cogent (Cogent Land LLP v Rochford District Council [2012] EWHC 2542 (Admin)). At this comparatively early juncture, it is very much feasible to address matters raised above through the next iteration of the plan</p>	

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			<p>and IIA. I.e. the next iteration of the new Local Plan should be accompanied by an IIA which includes an assessment of a new community of 1,500 – 4,500 at Land East of Chatham Green / South of Great Leighs, appraised using evidence available to it, including evidence that accompanies this representation. We suggest that such an appraisal should not merely see such a development as an alternative to strategic scale development to the east of Chelmsford, but should consider the impacts of both being delivered. Cogent also confirms that where matters with the Environmental Report are being corrected / updated, it is critical that the plan to which it relates is also updated to reflect revised findings, where appropriate. In the case of Cogent, the additional sustainability appraisal work undertaken was not simply an ex post facto exercise in justifying an approach already determined by the Council. Rather, it was clear that the Council was open to making amendments to the proposed strategy to reflect this additional work. It will be important that Chelmsford City Councils adopt a similarly open mind in respect of the findings from an updated IIA.</p>	
<b>POIIA59</b>	CJH Farming Ltd	Section 5	<p>The Council has prepared a Sustainability Appraisal in accordance with Section 19(5) of the Planning and Compulsory Purchase Act 2024 and the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. This has been published in the form of an Integrated Impact Assessment (IIA) prepared by WSP. 5.2 Section 5 of the IIA sets out the assessment of likely effects of the PODLP against the objectives that comprise the Assessment Framework (section 4 of the IIA). 5.3 Section 5.4 of the IIA assess the likely impacts of the proposed approach to the Employment Land Requirement. This is shown in Table 5.3 of the Assessment, an extract is copied below (see attachment). The Employment Land Requirement is anticipated to have a significant positive effect on the economy (Objective 3). This is supported by C J H in which Little Boyton Hall Farm as an existing rural employment site forms part of the overall employment land requirement and thus will contribute towards significant positive effects on the economy. Whilst there are no significant negative effects identified, paragraph 5.4.5 of the IIA does note that negative (and uncertain) effects have been identified across a range of the Assessment Objectives associated with biodiversity, transport, air quality, climate change and waste and natural resources, reflecting increases in trends such as commuting, new infrastructure requirements and emissions associated with HGV's. Whilst further consideration will be given to these once development management policies are developed and considerations such as site location, design and mitigation measures of development are better understood, we would disagree with the assessment against these objectives. 5.6 With biodiversity, the introduction of the 10% statutory requirement for BNG will guarantee beyond any doubt the overall improvement in biodiversity across Chelmsford as a result of new employment floorspace delivered through new sites, allocations and growth areas. The 10% is a minimum requirement, with the potential for sites to deliver in excess of 10%, with the garden communities expected to</p>	<p>The assessments are made in respect of specific aspects of the site option (biodiversity, transport, air quality, climate change and waste and natural resources and new infrastructure requirements) are made in light of available evidence, and, as noted the requirements of Development Management Policies, which will implement mitigation in response to the detailed plans submitted by site proposers.</p>

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POIIA51	Cliffords Group Ltd	Appendix F	<p>deliver 20%. As such, the delivery of new employment sites will inevitably result in a positive effect on biodiversity. 5.7 As for the impact on the other Objectives referenced, any potential negative impacts arising from commuter trends and HGV movements can all be appropriately managed through the development management process where planning applications are made for proposed employment site allocations to come forward in order to meet the Employment Land Requirement. Possible negative impacts can be mitigated against during both the construction and operational phases of development through Construction and Environmental Management Plans which can be secured by planning condition or the submission and approval of technical assessments setting out recommendations to negate any negative impacts during the lifetime of a planning application. 5.8 As such, the Employment Land Requirement will have a neutral effect against these Objectives. 5.9 Paragraph 5.4.5 goes onto note that there is potential for new employment uses to deliver benefits in respect of, for example, sustainable travel, health and enhancements to townscapes. This is supported and could therefore be reflected as uncertain positive effects. The Assessment identifies mixed effects to land use, cultural heritage and landscape/townscape reflecting the potential compromises to be made in allocating development, but also opportunities for the protection and enhancement of these resources. C J H considers by virtue of new employment development being able to preserve and enhance such resources through the development process this should either be assessed as neutral or minor (uncertain) positive effects. 5.11 Section 5.5 assesses the Preferred Spatial Strategy. Table 5.5 summarises the appraisal of the Preferred Development Requirements and Spatial Strategy, the cumulative effects of the spatial strategy are discussed at paragraphs 5.5.4 of the IIA, combining the preferred housing/Gypsy traveller and travelling show people requirement, preferred Employment Land Requirement and preferred spatial strategy. 5.12 Notwithstanding the assessed effects of the housing requirement against the Objectives and C J H's views on the Employment Land Requirement, overall, the cumulative effects are predominantly positive, with mixed effects against several Objectives and one minor negative. 5.13 A cumulative negative effect has been identified for waste and resource use as a result of new development. However, this is at odds with several of the strategic policies and development management policies in the Local Plan, in which sustainability and addressing climate change are priorities with new development expected to demonstrate how matters such as waste and resource use can be managed sustainably. These should be identified as neutral cumulative effects. (See attachments 1329430PO-A, B, C and D for full representation).</p>	Changes to the Green Wedge boundaries have been discounted as sufficient and suitable land is available



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			<p>form of an Integrated Impact Assessment (IIA) prepared by WSP. Section 5 of the IIA addresses the reasons for the selection of the preferred spatial strategy and the rejection of alternatives, specifically Table 5.11 summarises the reasons for rejection of the clusters of alternatives sites. Appendix 6 of the IIA sets out the reasons for rejection of specific sites. However, it appears that Land at Back Lane has not been assessed as a reasonable alternative. Cliffords would strongly urge the Council to review the robustness of the IIA on the basis specific reasonable alternatives have not been assessed as part of the SA process, drawing into question the legal compliance of the draft Local Plan. Were the Site to have been assessed as part of the IIA, it would represent a site that is deliverable within the Plan period and could contribute positively to the supply of education, recreation and leisure uses in Chelmsford. See attachment 1329435PO-B for full representation submission.</p>	<p>outside the Green Wedge to meet the area's development needs in a sustainable way. This approach has therefore been discounted.</p> <p>No change to the IIA.</p>
POIIA35	Natural England	Para. 1.7.2	<p>We agree with the biodiversity key sustainability issues although note that biodiversity net gain is mandatory for all developments apart from Nationally Significant Infrastructure Projects Biodiversity net gain - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>). We agree with the geology and soils key sustainability issues although note that previously developed land may have biodiversity (invertebrate) interest which needs to be taken into account by development.</p> <p>We advise that there is a criterion to test the plan's policies and proposals for negative impacts on European sites and SSSIs and that there is an indicator to ensure that the impacts of the plan's policies on European Sites and SSSIs are included in proposals to monitor the plan. Any policies or proposals that will have a likely significant effect on a European site and/or an adverse effect on the integrity of a European site should be removed from the plan or modified to prevent such effects. Cumulative impacts should be adequately addressed. Alternatives should be assessed, particularly in cases where impacts on European sites/SSSIs cannot be ruled out, in line with the mitigation hierarchy. Local Sites should be addressed and given appropriate weight and there should be a criterion to test the plan's policies and proposals for adverse effects on Local Sites.</p> <p>The SA Report should include objectives to protect and improve access to the natural environment and include indicators to improve the provision of natural greenspace, recommending the use of ANGSt and Green Infrastructure Standards where appropriate. The SA Report should consider the Essex LNRS and the green infrastructure network and its protection/enhancement through appropriate objectives and/or indicators. Impacts on soils should be assessed in the SA report. The SA Report should include measures to avoid/minimise impacts, particularly in area of best and most versatile agricultural land. The SA should considered alternatives, particularly in areas where development on best and most versatile land cannot be avoided.</p>	<p>The IIA works in conjunction with the Local Plan to deliver sustainable development, including through the application of site and Development Management policies which contain measures to ensure that proposed development applies appropriate infrastructure standards. The IIA Objectives and indicators have been subject to two previous rounds of consultation with statutory consultees.</p> <p>In subsequent iterations of the IIA, clearer reference will be made to policy protection for protected sites, including monitoring of policy implementation.</p> <p>Further refinement of policy recommendations will be made in respect of mitigation measures which should inform the application of policy as part of site development, including the use of Access to Natural Greenspace Standards and Green Infrastructure standards where appropriate. The impact on soils has</p>

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POIIA46	Obsidian Strategic Asset Management Ltd	Approach A, Approach C & Assessment Objective 6	<p>In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies that are set out in local plans must be the subject of a Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against all reasonable alternatives. The Local Plan should ensure that the results of the SA process clearly justify any policy choices that are ultimately made, including the proposed spatial strategy and site allocations (or any decision not to allocate sites) when considered against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making, and scoring should be robust, justified, and transparent. The Preferred Options Local Plan is accompanied by an Integrated Impact Assessment (IIA). This encompasses the sustainability appraisal, strategic environmental assessment, habitats regulations assessment, health impact and equality assessment of the review of the adopted Local Plan. The Proposed Spatial Strategy draws on aspects of the five spatial options set out in the Issues and Options Consultation Document, which comprised: Approach A: Growing Existing Strategy; Approach B: Growth in Urban Areas; Approach C: Wider Strategy; Approach D: Growth Along Transport Corridors; Approach E: New Settlement. Although the preferred Spatial Strategy is a hybrid of Spatial Approaches A to E, it most resembles Spatial Approaches A and B by focusing development in and close to the Urban Areas and Key Service Settlements outside of the Green Belt, whilst providing for continued housing and employment land provision through the proposed allocation of a new garden community and sites directly related to the A12, and sites in the Chelmsford Urban Area, which contain significant areas of previously developed land. Appendix K provides an appraisal of the alternative spatial approaches. Assessment Objective 3 (Economy, Skills and Employment) is to achieve a strong and stable economy which offers rewarding and well-located employment opportunities to everyone. Approach A has an assessment score of "Major Positive/ Minor Negative". The supporting commentary gives no explanation at all as to why a Minor Negative has been identified. This</p>	<p>been considered through the Land Use IIA Objective and significant negative scores provided where greenfield land is proposed for development, recognising the loss of this resource.</p> <p>The IIA has assessed those sites which are considered to be reasonable options, including the identification of reasonable alternatives. Sites which are not considered as part of this process have failed to meet the selection criteria applied.</p> <p>It is agreed that a correction to the Approach A score and narrative (Appendix K, page 760) is required and will be attended to as part of the next iteration of the IIA.</p>

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			<p>needs to be clarified and corrected. Approach C is given an assessment score of Minor Positive. This is a lower grading than Approaches B and D which are scored as Major Positive, and E which is scored as Major Positive/ Unknown. The reason given is: “Under this approach residential development would be more dispersed throughout the City Area and including at settlements without major employers and which are less accessible to the City Centre. In consequence, prospective residents in these settlements would be likely to have poorer accessibility to employment opportunities. (pg 762)” This is considered to be a sweeping generalisation and pays no regard to the very significant employment opportunities on offer in Broomfield, which itself features the Council’s single largest employer, Broomfield Hospital. Assessment Objective 6 (Transport) seeks to reduce the need to travel, promote more sustainable modes of transport and align investment in infrastructure with growth. Approach A is assessed as Minor Positive/ Minor Negative. The negative being that Directing a proportion of the City Area’s housing requirement to the key service settlements of Great Leighs, Broomfield, Bicknacre, Boreham and Danbury could result in increased car use given the existing size of the settlements and the more limited range of services and jobs they provide. Again, this is considered to be a generalisation. Broomfield has the major services that would be expected of a regional centre, for example Broomfield Hospital plus a secondary school. It is very well located for accessibility to Chelmsford, being described in the adopted Local Plan as a ‘quality’ bus corridor with a very good frequency of services connecting into Chelmsford City Centre.</p>	
<b>POIIA66</b>	Whirlledge & Nott	Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm)	<p>Justification and Issues and Options Integrated Impact Assessment At the Issues and Options stage of local plan preparation, five different options were set out and assessed in isolation and it was clear from the evidence base and at a basic level (Figure 2 below-see attachment), that Option E: New Settlement, performed worst against the SASEA criteria, given the scale, isolated location and potential impact on sensitive receptors. Simplistically, it would appear that accommodating development within the urban area is the most sustainable, followed by continuation of the existing strategy, which would seem obvious approaches to continue to deliver sustainable development, with potentially a few tweaks to remedy any know issues, which aren’t working i.e. an increase in smaller sites to allow for delay in the strategic allocations. However, this would not appear to be what has been taken forward in the Preferred Options document, with the worst approach forming the main component of the strategy to meet the additional housing requirement. Highways evidence In support of the same Issues and Options consultation document, the highways evidence titled “Sustainable Accessibility Mapping &amp; Appraisal: Technical Note” identified broad locations for 8 different locations, which were combined together to make up the 5 different strategic options. Location 8 was identified as the new settlement location at Hammonds Farm. The summary table below (see attachment) identifies that location 8 has the 2nd worst “location</p>	<p>The objection to the proposed allocation at East Chelmsford is noted.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The discounting of options at an early stage based on available evidence is a Council-led process.</p> <p>The Preferred Options Local Plan presents a range of sites at various spatial scales which are considered to be capable of best meeting the identified development requirements.</p>

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			<p>average” highways assessment score and given the quantum of housing attributed to it, this meant that Option E: New settlement scored the worst of the 5 different strategic options from a highways perspective. Place-making and Spatial decision to allocate Hammonds Farm Breaching the A12 on the eastern side of the city is significant, given that it forms a defensible boundary and prevents the city from sprawling into an area of attractive, rising countryside towards Danbury/Little Baddow further east, without a strongly defined boundary feature or features. The A12 as a barrier also has significant implications for the potential sustainability of the new settlement and whilst much is made of the Park and Ride as a rationale for its allocation, the majority of resident movements will not use the Park and Ride and in order to get back to the city, new residents will need to cross the A12, hence the preference will still very much be on the use of cars. This sense of detachment would also have significant implications for the attractiveness and safety of active travel options put forward under this option. LTN 1/20 requires cycle infrastructure to be “perceived to be safe so that more people feel able to cycle”. This is particularly important in light of the proposals at Hammonds Farm to deliver modal transport shifts towards non-car and active travel modes. The Transport Impact Appraisal of Preferred Spatial Approach (March 2024) (document reference T002) refers at 7.3.2 to an October 2022 Stantec report prepared on behalf of Grosvenor entitled “Hammonds Farm Transport Technical Report”; this document states that Hammonds Farm will aspire to achieve ambitious modal split targets for its residents, with around 60% of all daily journeys undertaken by sustainable modes of transport (i.e. non car modes). We consider that this extent of modal shift to be too optimistic given that the site is located adjacent to the A12. The existing footpath underpass connecting to Chancellors Park would be upgraded to a cycle route but this is within flood zone 3 and would mean that the community would be largely cut-off during flood events to those seeking to utilise active travel. Even with its recent and planned upgrades, Boreham Interchange is a substantial physical and perceptual barrier to active travel from the Hammonds Farm site. Whilst the new settlement is detached from the City, given the infill on the western side of the A12, it will feel like a poorly located, detached suburb, with limited links to and from it, and its sense of place will seem strange as the A12 will act as a significant, unattractive barrier, which is a common legacy of many poor planning decision in numerous cities across the UK, where major roads bisect parts of a settlement and which are subsequently then cut off. In terms of place-making, this creates unattractive neighbourhoods with poor environments and needs to be rethought. There are much more sustainable, accessible locations (as proved by the issues and options evidence base), which have been dismissed without obvious reasoning why, including land west of Willow Grove in South Woodham Ferrers. This site is within walking distance of the town centre and the station and spatially makes much more sense, being adjacent to an existing urban extension and settlement boundary. Delivery and deliverability The housing trajectory in the Preferred Options document identifies that the</p>	<p>The various challenges presented in respect of the evidence base are noted, particularly in respect of physical separation and opportunities for modal shift are noted. The development is intended to be planned as a garden community with a degree of self-containment and measures to promote modal shift are integral. It is the role of strategic, site and development management policies to secure these measures as part of site development.</p> <p>Questioning of housing delivering rates, particularly in comparison to potentially competing sites, is noted. This is a matter for detailed phasing and delivery agreements between the Council and the site developer/promoter.</p> <p>Challenges to and defence of the credibility of the evidence base which supports a development is part of the Local Plan Examination in Public.</p> <p>No change to the IIA.</p>

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			<p>Hammonds Farm development will deliver 1,350 units between years 7-12 of the plan, and 1,180 during years 13-18 which for a new settlement is considered extremely optimistic to the point where its simply unrealistic. When compared to historic allocations in the adopted local plan from 2020, which are adjacent to existing settlements/infrastructure and so considered to be much more straightforward, these were originally identified in the previous Preferred Options Local Plan in March 2017, with adoption circa 3 years later in 2020 and the large majority of these allocations have still not started delivering housing yet, which is over 7 years later (from the Preferred Options). The Table below (see attachment) lists the different allocations from the trajectory in the adopted plan. Most have already slipped by at least 3 years. None have yet received detailed planning permission, so there is likely to be further delay. All are much more straightforward development opportunities than a new settlement, given the lack of infrastructure and lead in times. Lichfield's industry-renown evidence base document "Start to Finish", was updated for a third time in March this year. This identifies that for residential schemes of 2000+ units, the average time from validation to first homes being delivered is circa 8.4 years. It is clear that in Chelmsford, given the planning framework and requirement for masterplanning processes and delays identified in the table above, sites take a significant amount of time to be delivered (over and above the national average). As a planning application is not imminent and is unlikely in advance of adoption there is serious doubt about delivery within 7 years as currently identified. Ignoring the soundness of the site selection, this development cannot be relied upon until much later in the plan period. Potentially not even starting post 15 years, which was the original understanding of Issues and options document, seeking to extend the plan period by an extra 5 years. The trajectory appears to have been amended to ensure that there is no gap in delivery, which is sensible, however, it is not considered sensible to rely on this site to deliver houses in the period 7-12 years. There is a need for much more deliverable developments, which include sensible scale opportunities adjoining sustainable settlements that can be delivered in the short to medium term, like the site West of Willow Grove, South Woodham Ferrers. Potential deliverability risks were identified in respect of the new settlement approach in the Integrated Impact Assessment of the Review of the Adopted Local Plan: Issues and Options Consultation Document (reference IIA002), which states that: "...whilst in part an extension of the existing approach in the adopted Local Plan, greater uncertainty is associated with the concentration of development activity in a limited number of locations which may mean that some local needs are not met. Further, reflecting the complexity of bringing forward large allocations, there could be greater uncertainty associated with delivery of a new settlement in the plan period." Whilst document IIA002 identifies similar overall effects upon sustainability between the spatial options it assesses, we agree with the above assessment that deliverability within the Plan period is a key distinguishing factor of the Preferred Option. We intend to scrutinise this Option further, should the Council intend to continue with this</p>	

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			<p>approach at the Regulation 19 Plan. Summary of Issues and Options Assessment scoring At the Issues and Options stage, it was clear that the new settlement option scored worst in both in terms of the integrated impact assessment and also by the highways evidence, yet it has been included in the preferred options and taken forward to meet housing need during the middle part of the plan period, not extending the plan by 5 years as was envisaged. The justification for its inclusion appears to be that the positives and benefits from the previous local plan strategy have been incorporated into the wider assessment, hence any negatives are subsequently watered down as the overarching conclusion is a positive one, given the positive elements of the strategy. The previous local plan strategy was considered a sustainable one (as proven again by the Issues and Options SASEA), therefore it can be concluded that there are better performing strategies that should have been taken forward at this stage and which would deliver a more positive outcome. Given the evidence, the chosen strategy is not the “most sustainable strategy”, albeit the requirement for the “most sustainable strategy” has long since been removed from the NPPF. That said, if there is a more sustainable approach, it doesn’t make sense to choose a worst performing approach, given it is not justified.</p>	
<b>POIIA66</b>	Hawridge Strategic Land	Strategic Policy S7	<p>This representation is also supportive of the spatial strategy to focus new housing to the most sustainable locations, including development around Service Settlements such as East Hanningfield, on the basis that they support sustainable development. There is also agreement with the acknowledgement in the Preferred Options Integrated Impact Assessment Consultation Document and emerging draft Local Plan that there is a need to allocate significant new development on greenfield sites to meet future housing needs in full whilst still pursuing a brownfield first approach that is advocated by national policy.</p>	Support for the Local Plan Review and IIA is noted.
<b>POIIA37</b>	Crest Nicholson	Section 5	<p>The Council has prepared a Sustainability Appraisal in accordance with Section 19(5) of the Planning and Compulsory Purchase Act 2024 and the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. This has been published in the form of an Integrated Impact Assessment (IIA) prepared by WSP. 3.2 Section 5 of the IIA addresses the reasons for the selection of the preferred spatial strategy and the rejection of alternatives, specifically Table 5.11 summarises the reasons for rejection of the clusters of alternatives sites. The IIA assesses an alternative spatial strategy, expanding the existing development allocations within the adopted spatial strategy with further expansion of Northeast Chelmsford (Chelmsford Garden Community). West Chelmsford is one of the locations assessed under this alternative spatial strategy. The reason for excluding West Chelmsford to focus greater levels of growth towards existing strategic growth sites/locations is owing to ‘The impact on and the capacity of the local road network and relative remoteness from the strategic road network’. 3.3 The approach adopted to discounting locations in this</p>	<p>The IIA has assessed those sites which are considered to be reasonable options, including the identification of reasonable alternatives.</p> <p>The Preferred Options Local Plan presents a range of sites at various spatial scales which are considered to be capable of best meeting the identified development requirements.</p> <p>No change to the IIA.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			<p>way fails to recognise the potential opportunities for sustainable development in locations such as West Chelmsford. This location has been recognised by the Council as a sustainable location for growth as part of the current Adopted Chelmsford Local Plan. Alongside potential for larger scale growth there is therefore also potential for extension of the current allocation as part of any plan review. It is therefore inappropriate to discount the location purely on the basis of conflict with spatial strategy. Similarly, the location is highly sustainable and does not rely on significant new transport infrastructure given the good pedestrian and cycle connectivity, and bus provision through the phase 1 development.</p>	
<b>POIIA55</b>	A.G. & P.W.H Speakman	Section 5 and Appendix 6	<p>The focus of this representation relates to the Landowner's interests in Land at Anchor Field, Danbury (hereafter referred to as the "Site"). Ref: 21SHELAA82. The Council has prepared a Sustainability Appraisal in accordance with Section 19(5) of the Planning and Compulsory Purchase Act 2024 and the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. This has been published in the form of an Integrated Impact Assessment (IIA) prepared by WSP consultants. 3.2 Section 5 of the IIA addresses the reasons for the selection of the preferred spatial strategy and the rejection of alternatives, specifically Table 5.11 summarises the reasons for rejection of the clusters of alternatives sites. 3.3 Appendix 6 of the IIA sets out the reasons for rejection of specific sites. However, it appears that Land at Anchor Field has not been assessed as a reasonable alternative. The Landowner would strongly urge the Council to review the robustness of the IIA on the basis specific reasonable alternatives have not been assessed as part of the SA process, drawing into question the legal compliance of the draft Plan. 3.4 Were the Site to have been assessed as part of the IIA, it would represent a site that is deliverable within the Plan period and could contribute positively to housing delivery in Danbury. (See attachment 1329445PO-A for full representation)</p>	<p>The IIA has assessed those sites which are considered to be reasonable options, including the identification of reasonable alternatives. Sites which are not considered as part of this process have failed to meet the selection criteria applied.</p> <p>No change to the IIA.</p>
<b>POIIA43</b>	Higgins Group	Green Belt	<p>The Chelmsford Local Plan Preferred Options Consultation document is accompanied by an Integrated Impact Assessment, prepared by WSP. Local Plans need to be supported by a robust and credible evidence base in order to meet the tests of soundness and the Integrated Impact Assessment forms a technical part of the evidence to inform the plans strategy, policies and requirements. The Integrated Impact Assessments is to be read alongside the Preferred Options as the Council undertakes a comprehensive review of their Local Plan and is used as a tool to consider options and different approaches for the plan as it evolves through further rounds of consultation and engagement. The Council have sought to align the methodology of the Integrated Impact Assessment with the priorities and objectives to understand and demonstrate the relationship between the plan and the evidence underpinning it. We are however concerned that the decision by the Council not to review the Green Belt boundaries as part of this Local Plan review has not been tested within the</p>	<p>The IIA appraises the Local Plan Review from Issues &amp; Options Stage through to Submission. This includes reasonable alternatives in the form of spatial, site and policy options.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. It would also undermine the protection of the Green Belt by national</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			<p>Integrated Impact Assessment. The Council have committed to undertaking a comprehensive review of their plan but set out an approach that does not address this fundamental policy position. Because of this position, the Council through the Integrated Impact Assessment have not taken the opportunity to consider what opportunities may be available to deliver the plans priorities and objectives through settlements and locations in the Green Belt. To justify this position, the Council are relying on the position they established in the 2021 SHELAA Report that detailed “more than sufficient land is being promoted for development outside of the Green Belt and Green Wedge through the SHELAA call for site process to meet the identified development needs for the new Local Plan period including the housing requirement set out within the Preferred Options Consultation document.” (page 143, para 5.5.19 of the Integrated Impact Assessment). In our view this approach is incorrect as the methodology should be objective and should not be guided by the number of sites and amount of land being promoted through the SHELAA. The position established by the Council is taking a “policy on” position which is further reinforced incorrectly by consideration of alternative spatial options found in Table 5.7 of the Integrated Impact Assessment. The Council have declared a “housing crisis” across Chelmsford and in order to help address this, sites and settlements within the Green Belt should have been considered and assessed objectively by the Council to facilitate opportunity for sustainable development to come forward across the plan area. By following the approach the Council have failed to consider in the Integrated Impact Assessment sites and settlements that are sustainable (as identified by the Council settlement hierarchy) as potential for future growth through allocations in the Local Plan. Locations within the Green Belt offer a range of services and facilities and have the capability of addressing the Council “housing crisis”. The Integrated Impact Assessment should have been prepared with considerations as to how allocations in the Green Belt, brought about through releasing land via the Local Plan are capable of providing residential opportunities in sustainable locations. Ramsden Heath as identified by the Council is a sustainable settlement, albeit in the Green Belt. Ramsden Heath has a variety of services and facilities to meet the needs of the local community but through maintaining the “policy on” position of restraint any such opportunity has not been considered by the Integrated Impact Assessments. It is acknowledged that Green Belt is a national designation but the Local Plan and the Integrated Impact Assessment has the ability to take a strategic review of the boundaries which were established through the Chelmsford Site Allocations Document in 2012. The National Planning Policy Framework allows local planning authorities to undertake a review of boundaries as part of a Local Plan under exceptional circumstances. In our view exceptional circumstances exist in Chelmsford due to the time since the last review, the housing crisis that has been declared and the need for plans to be kept up to date. By taking an objective and positive view of the Green Belt, the Council could have considered opportunities within settlements that are in the Green Belt. Many of these are sustainable and</p>	<p>planning policy. This approach has therefore been rejected by the Council.</p> <p>No change to the IIA.</p>



Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			<p>offer a range of opportunities for future development through site allocations – although the Council have failed to take that opportunity through this Local Plan review. Without undertaking a review of Green Belt, the Council can not be confident that all reasonable alternatives have been considered and therefore assessed correctly as part of the Local Plan preparation in accordance with the tests of soundness as outlined in the National Planning Policy Framework.</p>	
<b>POIIA39</b>	Croudace Homes	Approach C – Exploring a wider strategy	<p>This section of the draft Local Plan is divided up into strategic growth locations with each location identifying a development site for new housing. As noted in other representations on behalf of Croudace Homes, whilst making provision for strategic growth in and around the higher order settlements of Chelmsford and South Woodham Ferrers is acknowledged, the failure to consider the option of providing managed growth in and around the Key Service Settlements that lie within the Green Belt leads to a polarisation of growth in the north and additional pressure on already stretched infrastructure in these locations. A full and comprehensive review of all options/alternatives for spatial growth, including a review of the Green Belt, is required. To introduce a more sustainable distribution of new housing it is recommended that Green Belt Review is undertaken. Specifically, the land on the eastern side of Rignals Lane, Galleywood considered as a strategic housing allocation for 250 dwellings. The accompanying Visioning Document (See attachment 1360825PO-B) sets out in some detail why the site can legitimately be removed from the Green Belt without undermining the principles of designation and the allocation of the site as part of these representations. Galleywood is a Tier 2 settlement with a population of 5,757, located south-east of Chelmsford in Essex, offering a variety of amenities for the existing community. The city of Chelmsford can be reached by bus in 20 minutes from Galleywood, via a number of services. Chelmsford benefits from regular railway services, providing connections to London in under 30 minutes. The Site is located to the east of Rignals Lane and on the eastern side of the village of Galleywood. The Site comprises of two arable fields and is surrounded on two sides by existing housing. The existing landscape features of the Site include the hedgerows and tree lines along the Site boundaries as well as a distinct tree line running through the centre of the site along the existing track and ditch. However, the area is not specifically identified for landscape quality protection and the site is considered to be visually well contained. The site is close to existing bus stops on Watchhouse Road to the west. The bus stops are accessible via the residential area to the west of the Site and fall within 400m of the Site's western boundary. These stops are served by the C7 and C57 services. The C7 and C57 bus routes provide connections to Chelmsford city centre and railway station. The C7 route provides a regular 20-minute service on weekdays, 30 minutes on a Saturday and 60 minutes on a Sunday. The C57 route provides evening services on a weekday and</p>	<p>The IIA will appraise the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. It would also undermine the protection of the Green Belt by national planning policy. This approach has therefore been rejected by the Council.</p> <p>No change to the IIA.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			Saturday. Chelmsford Railway Station is located 4km to the north of the Site and provides direct services to London and settlements in the region.	
<b>POIIA31</b>	Whirlledge & Nott	Approach C – Exploring a wider strategy	<p>CHAPTER 7 GROWTH AREA 3 – SOUTH AND EAST CHELMSFORD This section of the draft Local Plan is divided up into strategic growth locations with each location identifying a development site for new housing. As noted in other representations on behalf of Croudace Homes, whilst making provision for strategic growth in and around the higher order settlements of Chelmsford and South Woodham Ferrers is acknowledged, the failure to consider the option of providing managed growth in and around the Key Service Settlements that lie within the Green Belt leads to a polarisation of growth in the north and additional pressure on already stretched infrastructure in these locations. A full and comprehensive review of all options/alternatives for spatial growth, including a review of the Green Belt, is required. To introduce a more sustainable distribution of new housing it is recommended that Green Belt Review is undertaken. Specifically, the land on the eastern side of Rignals Lane, Galleywood considered as a strategic housing allocation for 250 dwellings. The accompanying Visioning Document sets out in some detail why the site can legitimately be removed from the Green Belt without undermining the principles of designation and the allocation of the site as part of these representations. Galleywood is a Tier 2 settlement with a population of 5,757, located south-east of Chelmsford in Essex, offering a variety of amenities for the existing community. The city of Chelmsford can be reached by bus in 20 minutes from Galleywood, via a number of services. Chelmsford benefits from regular railway services, providing connections to London in under 30 minutes. The Site is located to the east of Rignals Lane and on the eastern side of the village of Galleywood. The Site comprises of two arable fields and is surrounded on two sides by existing housing. The existing landscape features of the Site include the hedgerows and tree lines along the Site boundaries as well as a distinct tree line running through the centre of the site along the existing track and ditch. However, the area is not specifically identified for landscape quality protection and the site is considered to be visually well contained. The site is close to existing bus stops on Watchouse Road to the west. The bus stops are accessible via the residential area to the west of the Site and fall within 400m of the Site's western boundary.</p>	<p>The IIA will appraise the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. It would also undermine the protection of the Green Belt by national planning policy. This approach has therefore been rejected by the Council.</p> <p>No change to the IIA.</p>
<b>POIIA40</b>	Croudace Homes	Approach C – Exploring a wider area	<p>Criterion e) of Policy S1 seeks to focus development at the higher order settlements outside the Green Belt and respect the development pattern and hierarchy of other settlements. This criterion is not consistent with our previous strategic comments which seek a Green Belt Review and the identification of suitable sites for development within the Green Belt. The Council has not undertaken a thorough and conclusive review of alternatives. Without this, and a full reconsideration of housing and other sites in the south of the district, the issues raised in our comments on Strategic Priority 4 and 8 would result in an unbalanced growth</p>	<p>The IIA will appraise the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			<p>strategy that is not sustainable. It is essential that all options and alternative growth strategies are reviewed, and conclusions drawn on a full and comprehensive evidence base. It is not considered sufficient to exclude all development from the Green Belt based simply upon its historic designation. The NPPF explains that altering Green Belt boundaries can occur where exceptional circumstances warrant it. The strategic policies are expected to outline the circumstances of Green Belt release (paragraph 140 of NPPF refers). The NPPF states at paragraph 142 that “when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.” The guidance goes on to explain the situations where Green Belt release should be considered. Scope is provided for authorities to release Green Belt land where it is necessary and exceptional reasons exist. We argue that the impacts upon resources, infrastructure and the polarising of the district warrant careful consideration of introducing growth/development to the south of the district. In this context these submissions promote additional growth at Galleywood an inherently sustainable settlement and particularly land at Rignal’s Lane Galleywood for 250 new dwellings. Consequently, we recommend that criterion e) be amended to say: “Focus the majority of development at the higher order settlements outside the Green Belt but identify growth opportunities within the Green Belt where these are exceptionally sustainable and respect the development pattern and hierarchy of other settlements.”</p>	<p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council’s administrative area in a sustainable way. It would also undermine the protection of the Green Belt by national planning policy. This approach has therefore been rejected by the Council.</p>
POIIA32	Whirlledge & Nott	Approach C – Exploring a wider strategy	<p>Whilst there is support for the strategic aim of securing sustainable development and balancing the need for development with its impacts, the weight the emerging Plan places on protecting the Green Belt is considered to be at odds with a more balanced spatial and planning of the district for social and economic reasons. The emerging Plan seeks to protect the 34% of Green Belt land in the south of the district from development by focusing all growth needs within Chelmsford’s built-up area and to the north of the district. This artificially skews development into one area of the district thus isolating the south of the district from growth that can and should rightfully meet the social and economic needs of the population in that area. The current strategic priority places undue pressure on existing services and infrastructure in the north and it is unlikely that new development can address those pressures. Even if new infrastructure could be provided in the north to address those pressures, the Council’s strategy would effectively disadvantage certain groups who live towards the south who cannot, or find it very difficult to, access service infrastructure further away. A more balanced and sustainable strategy would be to undertake a review of all the growth needs within the district including areas within the Green Belt (including social, economic and environmental needs) and identify those locations for development and growth which could come forward without harming the five purposes of including land within the Green Belt. For example, there may be locations which have little effect on coalescence, unrestricted sprawl, safeguarding the countryside, preserving the setting of historic</p>	<p>The IIA will appraise the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council’s administrative area in a sustainable way. It would also undermine the protection of the Green Belt by national planning policy. This approach has therefore been rejected by the Council.</p> <p>No change to the IIA.</p>

Reference	Consultee	Relevant paragraph/ table/figure/ appendix	Consultee Response Summary	Response/Action
			settlements or encouraging regeneration. Against this context a full root and branch review of the Green Belt should be undertaken in order that all options and opportunities are assessed, and a more responsive and balanced Spatial Strategy developed. This exercise has not been undertaken. It cannot therefore be concluded that the draft Plan strategy has been fully tested and is in the best interests of the whole district.	
<b>POIIA41</b>	Croudace Homes	Approach C – Exploring a wider strategy	Croudace Homes support the identification of Galleywood as a Key Service Settlement (Tier 2 in the hierarchy of Policy S7). However, for the reasons already given, it is essential that a Green Belt Review be undertaken urgently and land at Rignal's Lane, Galleywood identified as a suitable housing site. To support this, Growth Area 3 should be expanded to reference the site and other allocations to the north of the district (Growth Area 2) deleted. This will ensure a more balanced, equitable distribution of new housing throughout the District, an alleviation of the pressures on existing schools and health facilities and the ability to better meet the needs of the population as a whole. To this end, the accompanying Visioning Document (see attachment 1360825PO-B) explains how the site can contribute in a sustainable way to delivering new homes, infrastructure and growth at Galleywood. This is considered in more detail in our representations to Growth Area 3.	<p>The IIA will appraise the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. It would also undermine the protection of the Green Belt by national planning policy. This approach has therefore been rejected by the Council.</p> <p>No change to the IIA.</p>
<b>POIIA58</b>	The Bucknell Family	Appendix F	Regiment Park, Little Waltham - The Council has prepared a Sustainability Appraisal in accordance with Section 19(5) of the Planning and Compulsory Purchase Act 2024 and the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. This has been published in the form of an Integrated Impact Assessment (IIA) prepared by WSP. Section 5 of the IIA addresses the reasons for the selection of the preferred spatial strategy and the rejection of alternatives, specifically Table 5.11 summarises the reasons for rejection of the clusters of alternatives sites. Appendix 6 of the IIA sets out the reasons for rejection of specific sites. However, it appears that Regiment Park has not been assessed as a reasonable alternative. The Landowners would strongly urge the Council to review the robustness of the IIA on the basis specific reasonable alternatives have not been assessed as part of the SA process, drawing into question the legal compliance of the draft Plan. Were the Site to have been assessed as part of the IIA, it would represent a site that is deliverable	<p>The IIA has assessed those sites which are considered to be reasonable options, including the identification of reasonable alternatives. Sites which are not considered as part of this process have failed to meet the selection criteria applied.</p> <p>No change to the IIA.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			within the Plan period and could contribute positively to sustainable development. See attachment 1329432PO-A for full representation submission.	
<b>POIIA50</b>	Cliffords Group Ltd	Appendix F	The Council has prepared a Sustainability Appraisal in accordance with Section 19(5) of the Planning and Compulsory Purchase Act 2024 and the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. This has been published in the form of an Integrated Impact Assessment (IIA) prepared by WSP. Section 5 of the IIA addresses the reasons for the selection of the preferred spatial strategy and the rejection of alternatives, specifically Table 5.11 summarises the reasons for rejection of the clusters of alternatives sites. Appendix 6 of the IIA sets out the reasons for rejection of specific sites. However, it appears that Land at Essex Regiment Way has not been assessed as a reasonable alternative. The Applicant would strongly urge the Council to review the robustness of the IIA on the basis specific reasonable alternatives have not been assessed as part of the SA process, drawing into question the legal compliance of the draft Local Plan. Were the Site to have been assessed as part of the IIA, it would represent a site that is deliverable within the Plan period and could contribute positively to the supply of education, recreation and leisure uses in Chelmsford. See attachment 1329435PO-A for full representation submission.	The IIA has assessed those sites which are considered to be reasonable options, including the identification of reasonable alternatives. Sites which are not considered as part of this process have failed to meet the selection criteria applied.  No change to the IIA.
<b>POIIA54</b>	Cliffords	Section 5 and Appendix 6	The focus of this representation relates to Clifford's interests in Land at Drakes Farm (hereafter referred to as the "Site"). The Council has prepared a Sustainability Appraisal in accordance with Section 19(5) of the Planning and Compulsory Purchase Act 2024 and the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. This has been published in the form of an Integrated Impact Assessment (IIA) prepared by WSP. 3.2 Section 5 of the IIA addresses the reasons for the selection of the preferred spatial strategy and the rejection of alternatives, specifically Table 5.11 summarises the reasons for rejection of the clusters of alternatives sites. 3.3 Appendix 6 of the IIA sets out the reasons for rejection of specific sites. However, it appears that Campion Farm has not been assessed as a reasonable alternative. Cliffords would strongly urge the Council to review the robustness of the IIA on the basis specific reasonable alternatives have not been assessed as part of the SA process, drawing into question the legal compliance of the draft Plan. 3.4 Were the Site to have been assessed as part of the IIA, it would represent a site that is deliverable within the Plan period and could contribute positively to housing delivery. (See attachment 1329435PO-D for full representation)	The IIA has assessed those sites which are considered to be reasonable options, including the identification of reasonable alternatives. Sites which are not considered as part of this process have failed to meet the selection criteria applied.  No change to the IIA.
<b>POIIA62</b>	This Land	Section 5	Hammonds Farm is therefore considered to not be in an accessible location, resulting in a greater level of impact on the existing congested highway network. It is in a high-risk flood	Objection to Hammonds Farm noted.

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
		Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm)	<p>area which would require substantial flood compensation areas and the site has a significant level of existing high voltage and high-pressure utilities crossing the site requiring significant easements. The area needed for easements together with the flood compensation areas would significantly reduce the level of developable area and further impact on the sites ability to provide suitable points of access.</p> <p>Based on the findings of this report it is concluded that site is not in a sustainable location and delivery of the level of development proposed is questionable, therefore it is considered that there is insufficient evidence to demonstrate that the site is suitable for an allocation of this magnitude and therefore should not be included as a site allocation within the forthcoming Local Plan.</p> <p>Instead, the preferred spatial strategy should be seeking to direct growth towards highly sustainable locations already well served by existing and planned for infrastructure, such as Boreham. Land at Main Road is a suitable, available and achievable site for residential allocation which would strongly align with the spatial principles proposed in the draft Plan and would contribute positively to housing delivery in the early years of the Plan period.</p>	<p>The IIA has assessed those sites which are considered to be reasonable options, including the identification of reasonable alternatives.</p> <p>The Preferred Options Local Plan presents a range of sites at various spatial scales which are considered to be capable of best meeting the identified development requirements.</p> <p>No change to the IIA.</p>
POIIA42	Croudace Homes	Approach C – Exploring a wider strategy	<p>Whilst there is support for the strategic aim of securing sustainable development and balancing the need for development with its impacts, the weight the emerging Plan places on protecting the Green Belt is considered to be at odds with a more balanced spatial and planning of the district for social and economic reasons. The emerging Plan seeks to protect the 34% of Green Belt land in the south of the district from development by focusing all growth needs within Chelmsford's built-up area and to the north of the district. This artificially skews development into one area of the district thus isolating the south of the district from growth that can and should rightfully meet the social and economic needs of the population in that area. The current strategic priority places undue pressure on existing services and infrastructure in the north and it is unlikely that new development can address those pressures. Even if new infrastructure could be provided in the north to address those pressures, the Council's strategy would effectively disadvantage certain groups who live towards the south who cannot, or find it very difficult to, access service infrastructure further away. A more balanced and sustainable strategy would be to undertake a review of all the growth needs within the district including areas within the Green Belt (including social, economic and environmental needs) and identify those locations for development and growth which could come forward without harming the five purposes of including land within the Green Belt. For example, there may be locations which have little effect on coalescence, unrestricted sprawl, safeguarding the countryside, preserving the setting of historic settlements or encouraging regeneration. Against this context a full root and branch review of the Green Belt should be undertaken in order that all options and opportunities are assessed,</p>	<p>The IIA appraises the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. It would also undermine the protection of the Green Belt by national planning policy. This approach has therefore been rejected by the Council.</p> <p>No change to the IIA.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			and a more responsive and balanced Spatial Strategy developed. This exercise has not been undertaken. It cannot therefore be concluded that the draft Plan strategy has been fully tested and is in the best interests of the whole district.	
POIIA69	Hallam Land Management		<p>3.15 An objective assessment of growth at Chelmsford Garden Community (Strategic Growth Site Policy 6) is provided by the the IIA 4, effectively as a of the environmental, social and economic performance of the allocation. As presented at Table 2, many significant positive effects of development here are identified, with weaker scoring including on loss of agricultural land, water usage and landscape considered unavoidable when having to provide for housing needs.</p> <p>3.16 HLM considers the IIA to demonstrate the positive overall sustainability and justification of strategic growth at Chelmsford Garden Community promoted by the Consultation.</p> <p>3.17 The success the Council has had and is planning to continue to achieve in delivering sustainable development at Chelmsford Garden Community reinforces the opportunity of the Site (of land north of Wheeler Hill) to expand that growth further. This is explained in greater detail in the following section of these representations.</p>	<p>Comments noted.</p> <p>No change to the IIA.</p>
POIIA67	Essex County Fire & Rescue Service	Local Plan	<p>Having reviewed the consultation document, at this time Essex County Fire and Rescue Service would ask that the following are considered during the continued development of the Chelmsford Preferred Options Local Plan and Preferred Options Integrated Impact Assessment Consultation:</p> <ul style="list-style-type: none"> <li>• Use of community spaces as a hub for our Prevention teams to deliver Fire Safety and Education visits, with the shared use of an electric charging point.</li> <li>• Adherence to the requirements of the Fire Safety Order and relevant building regulations, especially approved document B.</li> <li>• Installation of smoke alarms and/or sprinkler systems at suitably spaced locations throughout each building.</li> <li>• Implementation of vision zero principles where there are introductions of or changes to the road network.</li> <li>• Appropriate planning and mitigations to reduce risks around outdoor water sources.</li> <li>• Suitable principles in design to avoid deliberate fire setting.</li> <li>• Consideration for road widths to be accessible whilst not impeding emergency service vehicle response through safe access routes for fire appliances including room to manoeuvre (such as turning circles).</li> <li>• Access for Fire Service purposes must be considered in accordance with the Essex Act 1987 – Section 13, with new roads or surfaces compliant with the table below to withstand the standard 18 tonne fire appliances used by Essex</li> </ul>	<p>Such detailed matters will be considered as part of the refinement of site and development management policies.</p> <p>No change to the IIA.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			<p>County Fire and Rescue Service.</p> <ul style="list-style-type: none"> <li>• Implementation of a transport strategy to minimise the impact of construction and prevent an increase in the number of road traffic collisions. Any development should not negatively impact on the Service's ability to respond to an incident in the local area.</li> <li>• A risk reduction strategy to cover the construction and completion phases of the project.</li> <li>• Implementation of a land management strategy to minimise the potential spread of fire either from or towards the development site.</li> </ul>	
<b>POIIA68</b>	Martin Grant Homes	Green Belt	<p>Notwithstanding the above support for the principle of Growth Area 1, MGH are concerned that the Local Plan pursues a strategy which simply dismisses any form of Green Belt release on the edge of the urban area regardless of a site's suitability and Green Belt performance. Inevitably this approach will result in the allocation of land for residential development in less sustainable locations. To ensure that the most sustainable strategy is pursued by the Local Plan, the potential of land adjoining the urban area should be subject to great scrutiny and where necessary a focused Green Belt Assessment. Indeed, MGH believe there to be exceptional circumstances (as discussed later in these representations) which would warrant and support such an approach. As a minimum, this option should also be tested as part of the Sustainability Appraisal process.</p> <p>In MGH's view the release of underperforming Green Belt land which adjoins Chelmsford's urban area could provide a valuable source of deliverable and highly sustainable housing sites. The Council's blanket approach of not even assessing the potential for focused releases is stopping the most sustainable spatial strategy from being pursued.</p>	<p>The IIA appraises the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options, based on the current Local Plan.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. It would also undermine the protection of the Green Belt by national planning policy. This approach has therefore been rejected by the Council.</p> <p>No change to the IIA.</p>
<b>POIIA33</b>	Natural England	Strategic Policy S4 (HRA related)	<p>The policy states that 'Contributions from qualifying residential developments within the Zones of Influence, as defined in the adopted Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS), will be secured towards mitigation measures identified in the RAMS'. Please note that additional mitigation, such as the provision of accessible on-site greenspace, may also be required, depending on the size and location of the proposed development. Note also that greenspace provided as mitigation for impacts on designated coastal sites does not count towards biodiversity net gain but can contribute to no net loss.</p>	<p>Noted. Policy recommendations will be made accordingly, to be considered as part of preparing the Pre-Submission Local Plan.</p> <p>No change to the IIA.</p>



Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
POIIA33	Natural England	Strategic Policy S9 (HRA related)	<p>Natural England believes that this wording is potentially misleading as all residential developments which meet the criteria in the Essex Coast RAMS SPD are required to pay the tariff (i.e. it is not an either/or situation) and, in addition to paying the tariff, larger developments will need to provide suitable alternative and accessible natural greenspace, circular walks and other features; this approach should be 'business as usual' rather than 'exceptional circumstances'.</p> <p>We strongly advise rewording the policy and the supporting text to clarify the situation and ensure it is compliant with Policy DM16.</p>	Noted. Policy recommendations will be made accordingly, to be considered as part of preparing the Pre-Submission Local Plan.
POIIA33	Natural England	Strategic Growth Site Policy 10 – North of South Woodham Ferrers (HRA related)	<p>Strategic Growth Site Policy 10 – North of South Woodham Ferrers</p> <p>We are uncertain how the South East (Inshore) Marine Plan has been taken into account at this location, if at all. The policy states that there is a requirement to 'Undertake a project-level Habitats Regulations Assessment to address the impacts other than recreational disturbance'. We agree that a HRA needs to be undertaken but it must consider all impacts taken alone or in combination, including recreational disturbance. In addition, a Marine Conservation Zone (MCZ) assessment may also need to be undertaken.</p>	Noted. Policy recommendations will be made accordingly, to be considered as part of preparing the Pre-Submission Local Plan.
POIIA33	Natural England	Policy DM16 (HRA related)	<p>We note that the Local Plan has been screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) in the Integrated Impact Assessment. It may be necessary to outline avoidance and/or mitigation measures at the plan level, which will usually need to be considered as part of an Appropriate Assessment, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary. Natural England would welcome discussion on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed.</p>	Noted. Policy recommendations will be made accordingly, to be considered as part of preparing the Pre-Submission Local Plan.
POIIA33	Natural England	HRA	The Non-Technical Summary appears to be missing from the report.	An NTS is not included at this point but will be included as part of the Pre-Submission HRA.
POIIA33	Natural England	HRA	With regard to recreational pressure/urbanisation for all of the screened in sites, the report concludes that incorporated policy measures will provide sufficient safeguards to ensure that recreational pressure does not adversely affect Crouch Estuary sites...	Noted. Policy recommendations will be made accordingly, to be considered as part of preparing the Pre-Submission Local Plan.

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			<p>...Please note that whilst the Essex Coast RAMS is set up to account for the 'in combination' effects of new housing within a Zol; payment of the tariff does not automatically account for impacts from new development when considered individually. Additional mitigation measures, such as the provision of sufficient accessible on-site green infrastructure and circular walks, may also be required. Larger developments, particularly those close to the protected areas, will be required to adhere to the Natural England Suitable Alternative Natural Greenspace (SANG) guidelines in terms of the level of greenspace provision. Early discussion with Natural England is recommended to agree the required level of mitigation.</p>	
POIIA33	Natural England	HRA	<p>Please refer to our Designated Sites View for further information on sensitivity to pressures and seasonality which can help inform mitigation. For example, the dark bellied brent goose is sensitive to visual disturbance, above-water noise and litter, all which may be increased by increased visitor pressure.</p>	Noted
POIIA33	Natural England	HRA	<p>We agree with the additional wording that has been proposed to be added to Strategic Policy S4 to ensure that developers will need to demonstrate that sufficient waste water treatment capacity is available ahead of the occupation of new development to ensure no deterioration in the quality of receiving waters.</p>	Noted
POIIA33	Natural England	HRA	<p>Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.</p> <p>The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification.</p>	<p>Noted; the HRA addresses air quality issues for designated sites within the scope, which includes those within 200m of main roads with increased traffic where there is a realistic possibility of Annual average daily traffic (AADT) increasing by &gt;1000 in combination. We will keep this aspect under review and update the baseline data prior to issue of the final report.</p>

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**Issued by**

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Robert Deanwood

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**Approved by**

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Alistair Peattie

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**Document revisions**

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1	Draft	06.09.24